TSD File Inventory Index

US EPA RECORDS CENTER REGION 5



Date: Septenber 1006
Initial: Mesercas

| | | leatt AFB) | |
|--|-----|--|-------|
| Facility Identification Number: 147 570 | 024 | L 177 | - |
| A.1 General Correspondence | | B.2 Permit Docket (B.1.2) | |
| A.2 Part A / Interim Status | 1 | .1 Correspondence | |
| .1 Correspondence | y | 2 All Other Permitting Documents (Not Part of the ARA) | |
| .2 Notification and Acknowledgment | Y | C.1 Compliance - (Inspection Reports) | |
| .3 Part A Application and Amendments | y | C.2 Compliance/Enforcement | |
| .4 Financial Insurance (Sudden, Non Sudden) | 1 | .1 Land Disposal Restriction Notifications | brack |
| .5 Change Under Interim Status Requests | | .2 Import/Export Notifications | 1 |
| .6 Annual and Biennial Reports | | C.3 FOIA Exemptions - Non-Releasable Documents | 1 |
| A.3 Groundwater Monitoring | | D.1 Corrective Action/Facility Assessment | 1 |
| .1 Correspondence | | .1 RFA Correspondence | 1 |
| .2 Reports | | .2 Background Reports, Supporting Docs and Studies | 1 |
| A.4 Closure/Post Closure | | .3 State Prelim. Investigation Memos | 1 |
| .1 Correspondence A. 4. 1 - A. 4.4 | / | .4 RFA Reports ルバサ | 1 |
| .2 Closure/Post Closure Plans, Certificates, etc | | D. 2 Corrective Action/Facility Investigation | |
| A.5 Ambient Air Monitoring | | .1 RFI Correspondence | |
| .1 Correspondence | | .2 RFI Workplan | 1 |
| .2 Reports | | .3 RFI Program Reports and Oversight | + |
| B.1 Administrative Record | | .4 RFI Draft /Final Teport | + |
| | _ | 5 RFI QAPP | + |

| .6 RFI QAPP Correspondence | .8 Progress Reports | | |
|--|---|--|--|
| .7 Lab Data, Soil-Sampling/Groundwater | D.5 Corrective Action/Enforcement | | |
| .8 RFI Progress Reports | .1 Administrative Record 3008(h) Order | | |
| .9 Interim Measures Correspondence | .2 Other Non-AR Documents | | |
| .10 Interim Measures Workplan and Reports | D.6 Environmental Indicator Determinations | | |
| D.3 Corrective Action/Remediation Study | .1 Forms/Checklists | | |
| .1 CMS Correspondence | E. Boilers and Industrial Furnaces (BIF) | | |
| .2 Interim Measures | .1 Correspondence | | |
| .3 CMS Workplan | .2 Reports | | |
| .4 CMS Draft/Final Report | F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.) | | |
| .5 Stabilization | G.1 Risk Assessment | | |
| .6 CMS Progress Reports | .1 Human/Ecological Assessment | | |
| .7 Lab Data, Soil-Sampling/Groundwater | .2 Compliance and Enforcement | | |
| D.4 Corrective Action Remediation Implementation | .3 Enforcement Confidential | | |
| .1 CMI Correspondence | .4 Ecological - Administrative Record | | |
| .2 CMI Workplan | .5 Permitting | | |
| .3 CMI Program Reports and Oversight | .6 Corrective Action Remediation Study | | |
| .4 CMI Draft/Final Reports | .7 Corrective Action/Remediation Implementation | | |
| .5 CMI QAPP | .8 Endangered Species Act | | |
| .6 CMI QAPP Correspondence | .9 Environmental Justice | | |
| | l l | | |

| Note: Transmittal Letter to | Be Included with Reports |
|-----------------------------|--------------------------|
| Comments: | |



147 570 024 171V

| SENDER: COMPLETE THIS SECTION | OMPLETE THIS SECTION ON DELIVERY |
|--|---|
| Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. | A Received by (Rease Print Clearly) B. Date of Delivery C. Signature X A Gent Addressee |
| Article Addressed to: | D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No |
| Lieuterant Colonel Craig P. Johnson Commander, 375th Givil Engineer Squaden 701 Handlow Pornal | ··· |
| 701 Hangor Read Scott Air Fire Box, IL 62225 | 3. Se vice Type Certified Mail Registered Return Receipt for Merchandise C.O.D. |
| | 4. Restricted Delivery? (Extra Fee) ☐ Yes |
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUL 15 2011

REPLY TO THE ATTENTION OF: WC-15J

<u>CERTIFIED MAIL</u> 7001 0320 0006 0190 8261 <u>RETURN RECEIPT REQUESTED</u>

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott Air Force Base, Illinois 62225-5035

Subject: Notice of Violation

EPA I.D. No.: IL7 570 024 177

Dear Lieutenant Colonel Johnson:

From July 21 to July 23, 2009, representatives of the U.S. Environmental Protection Agency inspected Scott Air Force Base, a U. S. Air Force facility located in St. Clair County, Illinois. The multimedia inspection resulted in a Notice of Violation (NOV) letter, dated September 16, 2010. The NOV outlined findings and non compliance issues with current National Pollutant Discharge Elimination System permits and the Clean Water Act (CWA). After review of all submittals in response to the NOV, the Water Enforcement and Compliance Assurance Branch has no further concerns and considers the NOV closed with respect to the noncompliance noted in the NOV.

Thank you for your cooperation in responding to the NOV and in implementing corrective actions as needed. The facility remains responsible for complying with the requirements of the CWA, and other applicable federal, state, and local requirements.

If you have any questions regarding this matter, please contact Mr. Mike Lukowich, P.E. at (312) 353-4645.

Sincerely,

Tinka G. Hyde

Director, Water Division

cc: Todd Marvel, IEPA Terry LeMasters, IEPA

| ر ۔ | | Service MAIL RECEIPT Only; No Insurance Coverage Provided) |
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| | Restricted Delivery Fee (Endorsement Required) | |
| 0 O t | Total Postage & Fees | \$ 6.15 |
| ш | Name (Please Print Clearly | y) (to be completed by rpeller) |
| 7099 | Street, Apt. No.; or PO Bo | Cobnel Craig P. Johnson |
| 2 | City, State, ZIP+4 | argat rada |
| • | 300H AIC | Free Bax, IL 62725 |
| | PS Form 3800, July 1999 | See Reverse for Instructions |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JAN 1 4 2011

LR-8J

CERTIFIED MAIL 7099 3400 000030 RETURN RECEIPT REQUESTED

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott Air Force Base, Illinois 62225-5035

> Re: Notice of Violation Scott Air Force Base EPA I.D. No.: IL7 570 024 177

Dear Lieutenant Colonel Johnson:

On July 21 to July 23, 2009, representatives of the U.S. Environmental Protection Agency conducted a multi-media inspection at Scott Air Force Base, a U.S. Air Force facility located in St. Clair County, Illinois (Scott AFB or "the facility"). In response to violations of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR) identified during the inspection, EPA issued a Notice of Violation (NOV) to Scott AFB on September 16, 2010. Subsequent to EPA's NOV, Scott AFB submitted additional information regarding the identified violations on or about September 30, 2010, November 18, 2010, and December 17, 2010.

This letter is to inform you that EPA has reviewed the referenced responses and is awaiting submittal of the Industrial Storm Water Pollution Prevention Plan (SWPPP) that Scott AFB has indicated will be completed in March 2011. Please make sure that the SWPPP includes all the requirements of the Multi Sector General Permit for Storm Water Discharges from Industrial Activities. The SWPPP should be submitted directly to Mike Lukowich, P.E. with a copy to Susan Tennenbaum at the address noted on the letterhead, above. Please note that the revised SWPPP may also need to be submitted to the Illinois Environmental Protection Agency as required by the general permit.

If you have any questions and/or concerns regarding this matter, please contact me at (312) 886-6199.

Sincerely,

Diane M. Sharrow

Senior Inspector, RCRA Branch Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency Terry LaMasters, IEPA-Permit Sections, Bureau of Water

Land and Chemicals Division

| Type of Document: Notice of Violation and Inspection Report/Checklist No Violation Letter and Inspection Report/Checklist Letter of Acknowledgment Information Request Pre-Filing and Opportunity to Confer State Notification of Enforcement Action Return to Compliance Other Correspondence- NOD, memo to ORC | | | | | |
|--|---------------|----------|----------------|--|--|
| Facility Name: | Scott AFB | | | | |
| Street Address: | 701 Hangar Ro | rad | | | |
| City: <u>Scot+</u> | AFB State: I | Zip Code | e: <u>6722</u> | | |
| U.S. EPA ID#: <u>TL7570 024177</u> | | | | | |
| Assigned Staff: D. Sharrow Phone: 6-6199 | | | | | |
| | | | -1 | | |
| Name | Signature | | Date | | |
| Author | A just hano | L | 1-3-11 | | |
| Regional Counsel | N/A Qu | an baan | Y Judy . | | |
| Section Chief | NA | 10 Mercy | D. Mar. | | |
| | 1 | | | | |

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter.

Branch Chief

- 2. Make one copy of the contents of folder (including color photographs) for the official file.
- 3. Note that original inspection report, checklist & color photographs go to RCRA Fileroom.
- 4. Scan the letter, checklist and color photographs and save the file in the appropriate RB share drive folder.
- 5. Mail the original certified mail.
- 6. Distribute office copies (including report, checklist, and color photographs) to cc's and bcc's by email.

Once the certified mail receipt is returned:

- 7. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA Fileroom.
- 8. E-mail staff the date that the letter was received by facility.



Scott AFB revised letter

Susan Tennenbaum to: Diane Sharrow

01/14/2011 03:45 PM

Cc: Michael Lukowich

From:

Susan Tennenbaum/R5/USEPA/US

To:

Diane Sharrow/R5/USEPA/US@EPA

Cc:

Michael Lukowich/R5/USEPA/US@EPA

Hi Diane,

Here's the revised letter incorporating Mike's comments.

Susan



Response letter Scott AFB.doc

Susan M. Tennenbaum Associate Regional Counsel U.S. EPA, Region 5 77 West Jackson Boulevard (C-14J) Chicago, Illinois 60604 T (312) 886-0273 F (312) 886-0747



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 1 4 2011

LR-8J

CERTIFIED MAIL 7099 3400 000030 RETURN RECEIPT REQUESTED

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott Air Force Base, Illinois 62225-5035

> Re: Notice of Violation Scott Air Force Base

EPA I.D. No.: IL7 570 024 177

Dear Lieutenant Colonel Johnson:

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If you have any questions and/or concerns regarding this matter, please contact me at (312) 886-6199.

Sincerely,

Diane M. Sharrow

Senior Inspector, RCRA Branch Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency Terry LaMasters, IEPA-Permit Sections, Bureau of Water

TO STANKE OF THE OF THE

Land and Chemicals Division

| Type of Document: | ☐ Notice of Violation and Inspection Report | Checklist | | | | | |
|-------------------|---|--|-------|--|--|--|--|
| | ☐ No Violation Letter and Inspection Report/Checklist | | | | | | |
| | Letter of Acknowledgment | | | | | | |
| | Information Request | | | | | | |
| | ☐ Pre-Filing and Opportunity to Confer | | | | | | |
| | ☐ State Notification of Enforcement Action | | | | | | |
| | ☐ Return to Compliance | | | | | | |
| | ☐ Other Correspondence- NOD, memo to O | RC | | | | | |
| Facility Name: | Scott AFB | | | | | | |
| Street Address: | 701 Hangar Road | | | | | | |
| City: Scott A | FB State: <u>IL</u> Zip Coo | de: <u>62225 </u> | | | | | |
| U.S. EPA ID#: エ | L7 570 024177 | | | | | | |
| Assigned Staff: 1 |). Sharmy Phone: X 6 | -6199 | : | | | | |
| Name | Signature | Date | | | | | |
| Author | James James | 1-3-11 | _ | | | | |
| Regional Counsel | N/A | , p | 1G | | | | |
| Section Chief | Jone M. Joyn. | 1/3/11 | i/, (| | | | |
| Branch Chief | Jama J. James | 1 | 11 V | | | | |

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

- 1. Date stamp the cover letter.
- 2. Make one copy of the contents of folder (including color photographs) for the official file.
- 3. Note that original inspection report, checklist & color photographs go to RCRA Fileroom.
- 4. Scan the letter, checklist and color photographs and save the file in the appropriate RB share drive folder.
- 5. Mail the original certified mail.
- 6. Distribute office copies (including report, checklist, and color photographs) to cc's and bcc's by email.

Once the certified mail receipt is returned:

- 7. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA Fileroom.
- 8. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 1 2 2011

LR-8J

<u>CERTIFIED MAIL 7001 0320 0006 1448 5230</u> <u>RETURN RECEIPT REQUESTED</u>

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott Air Force Base, Illinois 62225-5035

Re: Notice of Violation
Scott Air Force Base

EPA I.D. No.: IL7 570 024 177

Dear Lieutenant Colonel Johnson:

On July 21 to July 23, 2009, representatives of the U.S. Environmental Protection Agency conducted a multi-media inspection at Scott Air Force Base, a U.S. Air Force facility located in St. Clair County, Illinois (Scott AFB or "the facility"). In response to underground storage tanks and hazardous waste violations of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR) identified during the inspection, EPA issued a Notice of Violation (NOV) to Scott AFB on September 16, 2010. Subsequent to EPA's NOV, Scott AFB submitted additional information regarding the identified violations on or about September 30, 2010, November 18, 2010, and December 17, 2010.

This letter is to inform you that EPA has reviewed the referenced responses and does not plan additional enforcement action under the Resource Conservation and Recovery Act (RCRA), nor those regulations related to underground storage tanks or hazardous waste at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency will continue to evaluate Scott AFB in the future.

If you have any questions and/or concerns regarding this matter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

Gary J. Victorine

Acting Chief, RCRA Branch Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency

| SENDER: COMPLETE THIS SECTION | COMP: TTE THIS SECTION ON DELIVERY |
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| 1. Article Addressed to: | If VES, enter delivery address below: |
| Lieutenant Colonel Craig P. Johnson | • |
| Commander, 375th Civil Engineer Syden | |
| Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Spolin 701 Hangar Road | |
| Scott Air Farce Base, Illinais 62225 | 3. Sewice Type ☑ Certified Mail □ Express Mail |
| • | ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. |
| | 4. Restricted Delivery? (Extra Fee) ☐ Yes |
| 7001 0320 0006 1448 5230 | |
| PS Form 3811, March 2001 Domestic Retu | ırn Receipt 102595-01-M-142 |

United States Postal Service .



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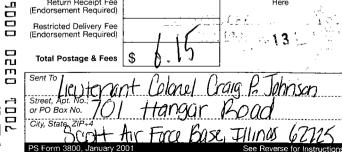
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- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified (Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

IL7570024177



Fw: Scott AFB Bldg 450 UST Line Leak Detectors

Arturo Cisneros to: Diane Sharrow

12/17/2010 03:42 PM

From:

Arturo Cisneros/R5/USEPA/US

To:

Diane Sharrow/R5/USEPA/US@EPA

History:

This message has been replied to.

Hi Diane.

I finally got the below confirmatory information from Scott AFB on the model of the ventless ALLD. There, they appear to be in compliance from the UST side of the program. Thank you.

Arturo Cisneros U.S. EPA - Region 5 77 W. Jackson Blvd. (LR-8J) Chicago, IL 60604 Ph: 312-886-7447

Fax 312-697-2088

---- Forwarded by Arturo Cisneros/R5/USEPA/US on 12/17/2010 03:32 PM -----

From:

"Bergmann, James E Civ USAF AMC 375 CES/CEAN" <james.bergmann@scott.af.mil>

To:

Arturo Cisneros/R5/USEPA/US@EPA

Cc:

"Patterson, John W Civ USAF AMC 375 CES/CEAN" < John.Patterson@scott.af.mil>

Date:

12/17/2010 01:39 PM

Subject:

Scott AFB Bldg 450 UST Line Leak Detectors

Mr. Cisneros,

In response to your request during our phone conversation a couple of days ago, I am forwarding photos of the line leak detectors on the three underground storage tanks located near Building 450 here at Scott AFB. For each of the three USTs I have included a photo of the top of the unit showing the model and serial numbers and a lower, side view. I apologize for the lack of clarity in some of the photos; the configuration of the equipment made it difficult to get into an ideal position to take the pictures. The pictures show that each of the units is a Red Jacket model FX1.

If you have any questions or if there is anything else I can do for you related to this matter, please let me know.

Thank you, and have a nice weekend.

Jim Bergmann, CHMM
Tanks Program Manager
Water Programs Manager (Acting)
375 CES/CEAN
Scott AFB
(618) 256-3452

=







Bldg 450 UST 99 Top.JPG Bldg 450 UST 99 Side.JPG Bldg 450 UST 100 Top.JPG Bldg 450 UST 100 Side.JPG





Bldg 450 UST 101 Top.JPG Bldg 450 UST 101 Side.JPG



Reply to Your 13 Dec 10 Phone Request

Patterson, John W Civ USAF AMC 375 CES/CEAN to:

Diane Sharrow

12/14/2010 10:19 AM

From:

"Patterson, John W Civ USAF AMC 375 CES/CEAN" < John.Patterson@scott.af.mil>

To:

Diane Sharrow/R5/USEPA/US@EPA

History:

This message has been forwarded.

Ms Sharrow, our Tanks Protocol Manager, Mr. Jim Bergmann, has contacted Mr. Arturo Cisneros. We are working to submit the requested UST information to your office. If you need anything else please let me know by E-Mail. Thanks

John Patterson Chief, Environmental Management 375 CES/CEAN Scott Air Force Base

IL7570024177



DEPARTMENT OF THE AIR FORCE HEADQUARTERS 375TH AIR MOBILITY WING (AMC)

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott AFB IL 62225-5035

18 Nov 10

Ms Diane Sharrow Environmental Protection Agency, Region 5 77 West Jackson Boulevard, LR-8J Chicago IL 60604

Dear Ms Sharrow:

In response to your 22 Oct 10 telephone message, clarifying information for the Notice of Violation (NOV), Scott Air Force Base, EPA IL No.: IL7570024177, is enclosed which verifies the actions taken to address the deficiencies identified in the 16 Sep 10 NOV for the Jul 09 multimedia inspection conducted by USEPA.

RCRA

1. Hazardous Waste Characterization

- Bldg 5022: Provided is a letter from the 126 MSG/EM detailing actions taken by the Propulsion Shop to correct the deficiency. Figure #1 in this letter shows the correct label on the drum (RCRA, Item #1).
- Bldg 5006: Reference the above letter (RCRA, Item #1). Figure #2 shows the correct label on the drum (black drum) and Figure #3 is a copy of the Hazardous Waste Profile Sheet for this waste stream.
- Waste Water Treatment Plant (WWTP) tray of unknown materials: The solids in this tray were containerized and are included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL) on manifest 005389733JJK. A copy of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Item #3) are provided. The liquid was consolidated with like material and was disposed on Manifest Number 001548070 SKS (RCRA, Item #4).
- WWTP Container (Picture 51): Copies of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. This drum is one of the six included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).

- WWTP Drum #2: Copies of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. The contents were consolidated with like material and included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).
- WWTP Drum #4: Copies of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. The contents were consolidated with like material and included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).
- WWTP Drum 10: Copies of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. The contents were consolidated with like material and included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).
- WWTP Fuel Filter Drum: A copy of the Bill of Lading and the Non-Hazardous Waste Profile Sheet are provided (RCRA, Item #5).
- WWTP Pails: Copies of the manifest (RCRA, Item #2) and the Non-Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. The contents were consolidated with like material and included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).
- WWTP container (picture 60): Copies of the manifest (RCRA, Item #2) and the Hazardous Waste Profile Sheet (RCRA, Items #3) are provided. The contents were consolidated with like material and included in item 15, Non-RCRA solids, D.O.T. Non-regulated (Absorbants w/POL).
- Vehicle Fleet Maintenance Bldg: The container was turned in to the Centralized Accumulation Site (CAS) and shipped out on Manifest 005389807JJK line item 18, Non-RCRA solids, D.O.T. Non-regulated (Absorbants) (RCRA, Item #6). Attached is the Hazardous Waste Profile Sheet (RCRA, Item #7).
- 2. Open Hazardous Waste Container: Reference 126 MSG/EM letter (RCRA, Item #1). Figure #4 shows the 30-gal drum inside of the overpack with an attached latched funnel. A second photo is also attached (RCRA, Item #8).
- 3. Hazardous Waste Container Label: The drum at the time of the inspection has been turned in to the CAS. The current drum used to collect this waste stream is shown in the attached picture with the correct label. Attached is a picture of the corrected label (RCRA, Item #9).
- 4. Oil Release: Attached is a picture of the cleaned oil spot (RCRA, Item #10).
- 5. Universal Waste: Attached is the recycling pick-up order for the shipment on which the bulb was disposed (RCRA, Item #11).

- 1. Piping Leak Detection Bldg 1640: Attached is the copy of the paid invoice and the Veeder Root printouts for both pressurized lines showing the 0.10 gal/hr leak detection test (UST, Item #1).
- 2. Piping Leak Detection Bldg 450: Attached is the work ticket annotating inspection of the leak detection at Bldg 450 (UST, Item #2).
- 3. Inoperative Spill and Overfill Prevention System Bldg 1575: Attached is the copy of the paid invoice and work ticket for repair of the spill and overfill alarm (UST, Item #3).

CWA

- 1. Failure to Meet Zinc Limit: The Illinois EPA (IEPA) issued a 26 Mar 10 violation notice for zinc exceedances (CWA, Item #1). Scott AFB received a return to compliance letter 8 Jun 10 (CWA, Item #2).
- 2. Late Annual MS4 Reports: The MS4 report was mailed by certified mail with a return receipt. A copy of the application for certified mail and the return receipt are attached (CWA, Item #3).
- 3. Inadequate SWPPP: A copy of the award letter (CWA, Item #4) and a portion of the Statement of Work (CWA, Item #5) for the SWPPP have been attached. Field work for the SWPPP is currently underway.

The attached documentation will provide conclusive verification of the actions taken to address the deficiencies in the NOV. If you have any questions, please contact Mr John Patterson, 375 CES/CEAN, (618)256-2046.

Sincerely

CRAIG P. JOHNSON, Lt Col, USAF

Commander

3 Atch

- 1. RCRA Documentation
- 2. UST Documentation
- 3. CWA Documentation



3283 IVANHOE AVE. ST. LOUIS, MISSOURI 63139 TEL: (314) 644-6000 FAX: (314) 644-1851

. INVOICE #: DATE: 07 PAGE: 1

TICKET: 20072983-0

DIVISION: 2 SALESPERSON:

TERMS: Net 10 DUE DATE: 08/09/09

Providing The Best Petroleum Equipment And Service At The Quality That Our Customers Deserve CUSTOMER: 3738

LOCATION:

SCOTT AIR FORCE BASE 701 HANGAR ROAD BLDG 56 SCOTT AFB, IL 622255035 SCOTT AIR FORCE BASE 701 HANGAR ROAD BLDG 56 SCOTT AFB, IL 622255035 DISPUTES REGARDING BILLED CHARGES WILL BE CONSIDERED IF AND ONLY IF REGISTERED WITH SUPERIOR'S SERVICE MANAGER WITHIN TEN (10) DAYS OF INVOICE DATE.

> SEE REVERSE FOR FURTHER INFORMATION

ORDERED BY: JIM/STEVE

ON: 07/16/09 @ 7:38 AM

ORDER NO:

WORK REQUESTED: UPGRADE VR350 AT BUILDING 1640 WITH RISK MANAGEMENT SOFTWARE.

ITEM NUMBER ITEM DESCRIPTION OTY PRICE SEM - RISK MANAGEMENT LEAK DETECTION FOR PLLD OR WPLLD VR330160-060 971.10 971.10 1,232.00 16.00 HRS @ 77.00/HR LABOR 2,203.10 TOTAL FOR INVOICE 753287 >>>>>>

PAID

AUG 0 : 2009

20th # 055935

BUILDING 1640 SCOTT AIR BASE, IL

AUGULE TIME ...

10-27-10 9:51

PRESSURE LINE LEAK TEST HISTORY

@ 1:PREMIUM

LAST 3.0 GAL/HR PASS: 10-27-10 9:50

PIRST 0.20 GAL HR PASS EACH MONTH:

> 10-03-10 19:29 09-01-10 22:12 08-04-10 22:24 07-03-10 21:50 06-03-10 23:38 05-05-10 14:19 04-02-10 19:42 03-03-10 20:12 02-03-10 21:13 01-01-10 10:32 12-01-09 12:51 11-01-09 20:25

FIRST 0.10 GALZHR PASS EACH MONTH:

10-17-10 22:20 07-03-10 22:33 04-10-10 21:03 03-07-10 18:56 02-21 10 9:04

* * * * . END * * * * * *

10-27-10 9:54

FRESSURE LINE LEAK TEST RESULTS

@ 3:NOLEAD-3

3.0 GAL∕HR RESULTS:

LAST TEST: 10-27-10 9:46 PASS

NUMBER OF TESTS PASSED PREV 24 HOURS : 56 SINCE MIDNIGHT : 17

0.20 GAL/HR RESULTS:

10-17-10 21:28 PASS 08-26-10 9:17 PASS 07-03-10 22:35 PASS 06-29-10 22:41 PASS 06-25-10 22:47 PASS 06-21-10 22:55 PASS 06-17-10 22:39 PASS 06-13-10 21:53 PASS 06-09-10 22:42 PASS 06-06-10 21:48 PASS

0.10 GAL/HR RESULTS:

10-17-10 22:20 PASS 06-06-10 22:15 PASS 01-30-10 19:13 PASS 11-13-09 23:02 PASS 09-12-09 23:02 PASS 09-04-09 23:01 PASS

* * * * * END * * * * *

Superior Equipment Co., Inc.

| Customer: 5 c. 7 | TAIN FORCE BALL |
|------------------|-------------------------------------|
| Address : | · · , |
| Call #: | Conf. #: . , Fault: |
| Ticket #: | Cause : |
| Start: 975 S | Stop: // / Remedy: |
| Travel Time : | Travel Miles : |
| Model #: | Serial # : |
| Model #: | Serial # : |
| Date: 4/6 | CUSTOMER SIGNATURE |
| The Process how | Checker 16 10 govern |
| states abou | to see we will be to see a small to |
| | |



3283 IVANHOE AVE. ST. LOUIS. MISSOURI 63139 TEL: (314) 644-6000 FAX: (314) 644-1851

INVOICE #: DATE: 09/

PAGE: 1 TICKET: 20075144-0

DIVISION: 2

SALESPERSON:

TERMS: Net 10 DUE DATE: 09/12/09

SCOTT AIR FORCE BASE 701 HANGAR ROAD BLDG 56 SCOTT AFB, IL 622255035

3738

SCOTT AIR FORCE BASE 701 HANGAR ROAD BLDG 56 SCOTT AFB, IL 622255035 DISPUTES REGARDING BILLED CHARGES WILL BE CONSIDERED IF AND ONLY IF **REGISTERED WITH SUPERIOR'S SERVICE** MANAGER WITHIN TEN (10) DAYS OF INVOICE DATE.

SEE REVERSE FOR FURTHER INFORMATION

ORDERED BY: JIM (CELL 314-800-7981) ON: 07/28/09 @12:45 PM

LOCATION:

ORDER NO:

CUSTOMER:

WORK REQUESTED: REMOTE ALARMS ON VR NOT WORKING ON BUILDING 1575.

WORK PERFORMED: 7/29/09 CHECKED OVERFILL ALARM ON VEEDERROOT AT BLDG 1575. NO VISUAL, NO

AUDIBLE. FOUND BULB BURNT OUT (NO VISUAL). FOUND TIMER FOR AUDIBLE TURNED TO 0 SECONDS. SET AUDIBLE TO 10 SECONDS, CHECKED OPERATION,

OK. TOOK BULB, WILL MATCH AND RETURN TO INSTALL NEXT TRIP.

(INSTALLED BULB ON 8/27)

ITEM NUMBER

ITEM DESCRIPTION

OTY PRICE

LIGHT BULB

5.04

5.04*

2.25 HRS @ 77.00/HR

LABOR

173.25

32 MILES @ \$.70 ENVIRONMENT FEE

22.40 9.00

TOTAL FOR INVOICE 753717 >>>>>>

209.69

PAIL SEP 1 5 20 1 Auth # 017156

Superior Equipment Co., Inc.

| Customer : Sea | T A.F. 8. | |
|-------------------|--|--------------------------|
| Address : S | A Company of the Comp | |
| Call #: | Conf. #: | Fault : |
| Ticket #: | | Cause : |
| Start: 3 | Stop : 범.30 | Remedy: |
| Travel Time : | Travel M | liles : |
| Model #: | Serial # | : |
| Model #: | Serial # | : |
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| TON SOME | | |
| Date: (Selection) | Ar. | MED CICNATURE |



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Assente East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829 James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT OUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 524-6308

CERTIFIED MAIL # 7008 1830 0001 4714 1568 RETURN RECEIPT REQUESTED

March 26, 2010

ORIGINAL

Received 30 Mar 2010, 0930 HM / CEAN

Scott Air Force Base 375 CES/CEAN 702 Hangar Rd., Bldg. 56 Scott AFB, IL 62225 Attn.: Vanessa Frangos

Re:

Violation Notice: W-2010-30105

Facility I.D.: Scott Air Force Base - IL0026859

Dear Ms. Frangos:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based upon review of available information and investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of violations of environmental statutes, regulations or permits as set forth in Attachment A to this letter. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified violations, including an estimate of a reasonable time period to complete the necessary activities. However, due to the nature and seriousness of the violations cited, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA to be held at an Illinois EPA facility, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. The response must address each violation specified in Attachment A and include for each, an explanation of the activities that will be implemented and the time schedule for the completion of each activity. Also, if a pollution prevention activity will be implemented, indicate that intention in any written response. The written response will constitute a proposed Compliance Commitment Agreement ("CCA") pursuant to Section 31 of the Act. The Illinois EPA will review the proposed CCA and will accept or reject the proposal within 30 days of receipt.

Page 2 Scott Air Force Base VN W-2010-30105

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with a referral to the prosecutorial authority.

Written communications should be directed to WASTEWATER VN COORDINATOR at the ILLINOIS EPA, BUREAU OF WATER, CAS #19, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276. All communications must include reference to this Violation Notice number, W-2010-30105.

Questions regarding this Violation Notice should be directed to Cathy Siders at (217) 524-6308.

Sincerely,

Michael S. Garretson, Manager Compliance Assurance Section

Bureau of Water

Attachment A

PAGE 1 OF 1

ATTACHMENT A

IL0026859

SCOTT AIRFORCE BASE

VIOLATION NOTICE: W-2010-30105

Questions regarding the violations identified in this attachment should be directed to CATHY SIDERS at (217) 524-6308.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations or permits. Included with each type of violation is an explanation of the activities the Illinois EPA believes may resolve the violations including an estimated time period for resolution.

Effluent Violations

Review the treatment plant operations/operational procedures and evaluate the treatment equipment in order to correct the deficiencies which caused the violations. Compliance is expected to be achieved within 30 days.

| Violation Da <u>te</u> | Violation Description | |
|--------------------------|--|----------|
| 06/30/2009 | 001-0 Effluent – Zinc, Total (as Zn) | |
| 07/31/2009 08/31/2009 | | ORIGINAL |
| 09/30/2009 | | 4.3.4 |
| Rule/Reg.: | Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2008) | |



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East. P.O. Bos. 19276. Spongfield, Illinois 62794-9276 • (217) 782-2829. James R. Thompson Center, 100 West Randolph, Soite +1-300, Chicago, II, 60601 • (312) 814-6025.

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-9720

CERTIFIED MAIL # 7008 1830 0001 4716 8022 RETURN RECEIPT REQUESTED

June 8, 2010

Scott Air Force Base 375 CES/CEAN 702 Hangar Rd., Bldg. 56 Scott AFB, IL 62225 Attn.: Vanessa Frangos RECEIVED

JUN . 1 2016

Re: Compliance Commitment Acceptance, Violation Notice: W-2010-30105

Facility I.D.: Scott Air Force Base – IL0026859

Dear Ms. Frangos:

The Illinois Environmental Protection Agency ("Illinois EPA") accepts the Compliance Commitment Agreement ("CCA") proposed by Scott Air Force Base, in a letter dated May 3, 2010, in response to the Violation Notice dated March 26, 2010. According to the CCA, the necessary actions have been taken to achieve compliance.

Failure to fully comply with the CCA may, at the sole discretion of the Illinois EPA, result in referral of this matter to the Office of the Attorney General, the State's Attorney or the United States Environmental Protection Agency.

The CCA does not constitute a waiver or modification of the terms and conditions of any license or permit issued by the Illinois EPA or any other unit or department of local, state or federal government or of any local, state or federal statute or regulatory requirement.

Questions regarding this matter should be directed to Cathy Siders at 217/782-9720. Written communications should be directed to Wastewater Violation Notice Coordinator at the Illinois Environmental Protection Agency, Bureau of Water, CAS #19, P.O. Box 19276, Springfield, IL 62794-9276, and all communications shall include reference to your Violation Notice Number W-2010-30105.

Sincerely,

Michael S. Garretson, Manager Compliance Assurance Section

Mile Corretor for

Bureau of Water

ORIGINAL

| • | APPLICATION FOR REGISTRATIO | N OR CER | TIFICATION OF OFFI | CIAL MAIL |
|---|---|--------------------------|---------------------------------------|--|
| NAME AND ADDRESS OF SENDER (Include Zip Code) 275 CES/CEAN 1essa Frangos/ YD-01 Hangar Road Scott AFB IL 62225-5035 | | LOCK NUMBER SEAL NUMBER | | TYPE OF MAIL CERTIFIED |
| | | | | POSTAGE AND FEES PAID U. S. AIR FORCE |
| REGISTERED OR CERTIFIED NUMBER | NAME OF ADDRESSEE, STREET, POST OFFICE ADDR | ESS | ACCOUNT CONTAINER NUMBER | REMARKS |
| 7099 3400 0018 5985 5230 | Illinois Environmental Protection Agen Division of Water Pollution Control Attn: Permit Section | cy | | RR |
| | Post Office Box 19276 Springfield Illinois 62794-9276 | | | |
| *************************************** | Last Item | | · · · · · · · · · · · · · · · · · · · | |
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PREVIOUS EDITION IS OBSOLETE.

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
|---|---|
| ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the revelue | A. Signature02: North Grand Avenue Each Post Office Box 19276 X Snorth Addressee |
| so that we can return the card to yo. Attach this card to the back of the mailplece, or on the front if space permits. | B. Received by (Printed Name) 2009 C. Date of Delivery |
| 1. Article Addressed to: | D. Is delivery address different from item 1? |
| Illinois Environmental Protection Agency | Man How |
| Division of Public Water Supplies | |
| | [] |
| Attn: Permit Section | * * |
| | 3. Service Type |
| Attn: Permit Section P.O. Box 19276 | 3. Service Type ☐ Certified Mail ☐ Express Mail |
| Attn: Permit Section | |
| Attn: Permit Section P.O. Box 19276 Springfield, Illinois 62794-9276 | ☐ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise |
| Attn: Permit Section P.O. Box 19276 Springfield, Illinois 62794-9276 Phase II Annual Rept | ☐ Certified Mail ☐ Express Mail ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ C.O.D. |

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| AND THE ENVIRONMENT/AC BLDG 171 2261 HUGHES AVE STE 155 | | | | | | | 2300 LAKE PARK DRIVE | | | | | OTHER | | |
| | | | | | | SUIT | | 30080 | | | | | (See Schedule if other) | |
| LACKLAND AFB TX 78236-9853 EUGENE A. FERGUSON, III (210) 395-8746 | | | | | | | SMYRNA GA 30080 DCMAATLANTACASD@DCMA.MIL | | | | | | | |
| | ferguson@ | | • | , | | | | | - | | | | | |
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| CONTRACTOR CODE 0VJ06 MACTEC ENGINEERING AND CONSULTING, INC | | | | | | | | | | MMDD) SEI | |] _{SMALL} | | |
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| | | , | | | | EFT: | | | | | | | | |
| | DELIVERY/ | | This delivery order/ | call is issued on | another Government | t agency o | r in accordan | ce with and sub | ject to term | is and condition | ns of above numbered of | ontract. | | |
| L | CALL | X | | | | | | | | | | | | |
| ORDER | OF PURCHASE Reference your furnish the following on items specified herein. ACCEPTANCE. THE CONTRACTOR HEREBY ACCEPTS THE OFFER REPRESENTED BY THE NUMBERED PURCHASE ORDER ACCEPTANCE. | | | | | | | | HASE OPDER AS IT M | AV DDE\/ | OUSLYHAVE | | | |
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1. In accordance with the authority of FAR 52.216-18 "Ordering" clause of the Basic Contract FA8903-08-D-8775 and this Task Order 0076, the contractor shall accomplish all effort described in the attached Statement of Work (SOW), dated 21 July 2010 at a Firm Fixed Price amount of \$65,656.00.

2. SECTION B - Supplies/Services:

| <u>ITEM</u> | SUPPLIES OR SERVICE | Qty S Purch Unit | Unit Price Total Item Amount |
|-------------|---|--|---|
| 0001 | Noun: | 1 Lot INVESTIGATION, ASSESSMENT, | \$65,656.00 \$65,656.00 SURVEY AND ANALYSIS |
| | ACRN: PR/MIPR: NSN: DD1423 is Exhibit: Contract type: Inspection: Acceptance: FOB: Item project mgr.: Descriptive Data: Work shall be performed i | AA F2MUAA0158B001 N - Not Applicable AB J - FIRM FIXED PRICE DESTINATION DESTINATION DESTINATION EXE n accordance with the Statement of cription/Specifications of the Basic Company of the Company of th | \$65,656.00 Work (SOW), dated 21 July Contract. |
| 0007 | Noun: ACRN: NSN: DD1423 is Exhibit: Contract type: Inspection: Acceptance: FOB: Item project mgr.: Descriptive Data: The contractor shall provices. | Lot DATA U N - Not Applicable AB J - FIRM FIXED PRICE DESTINATION DESTINATION DESTINATION EXE de data in accordance with CDRL's extion provided in the SOW, dated 2°CP). The prices associated with this | NSP NSP contained in Exhibit A and 1 July 2010. This CLIN is |

- 3. <u>SECTION C Description/Specification</u>: Work is to be performed in accordance with the Statement of Work (SOW) dated 21 July 2010 entitled, "Storm Water Pollution Prevention Plan at Scott AFB, IL."
- **4.** <u>SECTION D Packaging and Marking</u>: Each shipment of material and/or data shall be clearly marked to show the following information:

SHIP TO: HQ AFCEE/EXE ATTN: COR 2261 Hughes Avenue, Suite 155 Lackland AFB, TX 78236 MARK FOR: Contract Number: FA8903-08-D-8775

Task Order No: 0076 Item Number: **

CDRL Sequence Number: **

(**) As Applicable

5. <u>SECTION E - Inspection and Acceptance</u>: Inspection and acceptance will be performed by the appointed Contracting Officer's Representative (COR).

6. SECTION F - Deliveries or Performance:

| ITEM | SUPPLIES SCHEDULE DATA | QTY | SHIP TO | MARK FOR | TRANS PRI | DATE |
|------|---|--------------------|--------------|-------------|--------------|--------------|
| 0001 | | 1 | F2MUAA | F2MUAA | | 21 Feb 2011 |
| | Noun: | INVESTIC | SATION, AS | SSESSME | NT, SURV | 'EY AND |
| | ACRN: Descriptive Data: The contractor shall deliver data and B, as directed by the SOW | AA a in accorda | ance with th | ne CDRL's | contained | in Exhibit A |
| 0007 | | 1 | F2MUAA | F2MUAA | | 21 Feb 2011 |
| | Noun: ACRN: | DATA U | | | | |

7. SECTION G - Accounting and Appropriation Classification Data: "This Task Order is WAWF eligible."

AC-G003 SUBMISSION OF INVOICES FOR FIXED-PRICED TASK ORDERS (FEB 2008)

- (a) Contractor request for payment (invoice) under Firm-Fixed Price (FFP) contracts shall be submitted in accordance with FAR 52.232-10. The contractor's monthly payment request shall be based on the amount and value of work accomplished. If the individual task order is WAWF eligible, the invoice shall be created in the WAWF with supporting documentation attached.
- (b) After approval of the estimate by the Contracting Officer (CO) or the Contracting Officer Representative (COR), and approval of the other requirements of a properly executed invoice, the invoice and pertinent attachments will be forwarded to the cognizant disbursing office for payment as applicable.
- (c) Upon task order completion, contractor will create a separate final invoice and a Receiving Report (DD250Z) in the WAWF.
- (d) A final payment request (invoice) will not be approved/processed unless the contractor complies with the submittal requirements in FAR 52.232-26 and 52.232-27, if applicable.

ACRN Appropriation/Lmt Subhead/Supplemental Accounting Data Amount

\$65,656.00

57 03400 300 65BA 444418 020000 53470 41856F 667100 F67100

 Funding breakdown:
 On CLIN 0001:
 \$65,656.00

 PR/MIPR:
 F2MUAA0158B001
 \$65,656.00

Descriptive data: AMC OBAN 65BA

FSR: 020058 PSR: 105503 DSR: 260318

Project Number: VDYD16-7522

"PR COMPLETE"

8. The contractor's confirmation letter of negotiations, dated 16 August 2010, is hereby incorporated by reference.

9. SECTION J - List of Attachments and Exhibits:

| DOCUMENT | PGS_ | DATE | TITLE |
|--------------|------|-------------|---------------------|
| EXHIBIT AB | 4 | 08 JUN 2010 | CDRL |
| ATTACHMENT 1 | 11 | 21 JUL 2010 | SOW |
| ATTACHMENT 2 | 1 | 20 JAN 2010 | BASE SUPPORT LETTER |

FA8903-08-D-8775-0076 Attachment 1 Page 8 of 11 21 July 2010

PART C - PLANNING SERVICES

The Contractor shall provide A-E services in support of installation planning and programming activities. Planning activities may include those activities necessary to assess and manage environmental implications and conditions of installation activities as well as planning associated with managing the installation and its associated infrastructure.

7.0 ENVIRONMENTAL PLANNING AND PROGRAMMING

Not applicable to this TO.

8.0 INFRASTRUCTURE AND INSTALLATION PLANNING AND PROGRAMMING

Not applicable to this TO.

9.0 MILITARY FAMILY HOUSING PLANNING

Not applicable to this TO.

PART D – ENVIRONMENTAL SERVICES

For environmental services, all on-site workers (contractor and subcontractor) performing hazardous operations, including working with hazardous materials, must have completed the OSHA 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER) training and/or other applicable training, plus annual refresher courses. The Contractor shall maintain documentation supporting training records and have the site-specific HSP on site, available for workers and/or regulatory review.

10.0 TITLE I SERVICES FOR ENVIRONMENTAL PROJECTS

Not applicable to this TO.

11.0 TITLE II SERVICES FOR ENVIRONMENTAL PROJECTS

Not applicable to this TO.

12.0 OTHER ENVIRONMENTAL A-E SERVICES

The Contractor shall provide all labor, materials, and services necessary to conduct the activities described in the following sections. The Contractor shall perform tasks including, but not limited to, the following general tasks related to the specific work areas cited in this section:

- a) General technical support
- b) Permit applications, coordination, negotiation

4PAE08 SOW-A (FULL SCOPE)

- c) Identification of relevant regulations
- d) Modeling using computer codes (e.g. HEC-RAS)
- e) Meeting support and/or facilitation
- f) Technical investigations and/or evaluations

In the completion of these tasks, the Contractor shall comply with all federal, state and local rules and regulations.

12.1 to 12.13

Not applicable to this TO.

12.14 Water Quality

The Contractor shall perform technical activities and analyses in support of requirements to bring Scott AFB into full compliance with wastewater statutes, rules, and regulations.

12.14.1 Drinking Water

Not applicable to this TO.

12.14.2 Wastewater

The Contractor shall prepare a SWPPP to bring the installation into compliance with wastewater/storm water statutes, rules, and regulations. The Contractor shall provide a detailed evaluation of the current plans, incorporating additional regulatory guidance, and consolidating additional new information and mission changes (privatization) to the installation since the existing plans were created. The Contractor shall conduct activities to include a complete surface water and industrial wastewater runoff review. The Contractor shall also review all federal, state, and local regulations under the Clean Water Act, and any other regulatory drivers that may impact Scott AFB. Based upon these reviews, the Contractor shall update the existing SWPPP. In addition, the Contractor shall perform the following specific tasks, the results of which shall be compiled into a single draft report (CDRL A001b):

- Identify members and responsibilities of a SWPPP team responsible for the implementation, maintenance, and revision of the plan.
- Analyze the existing NPDES storm water permit to identify potential compliance problem areas and suggest methods to prevent violations.
- Develop a narrative of existing material management practices and control measures, develop a history of leaks and spills (following EPA 832-R-92-006 Section 2.2.3, or most current version), document historical analytical data, and make recommendations for contaminant control and material management improvements.

- Develop or update site maps to include, storm water "infalls" and "outfalls," drainage areas, and receiving waters for each storm water outfall.
- Develop or update site maps to identify existing storm water pollution control measures (e.g., Spill Control Gates) and all Environmental Restoration Program (ERP/CERCLA) sites, and all Solid Waste Management Units likely to contribute to storm water pollution.
- Develop or update site maps to identify the location of significant material storage and disposal sites that could impact storm water quality (e.g., major spills or leaks; fuel stations; vehicle and equipment maintenance areas; cleaning areas; loading and unloading areas; waste storage areas; liquid storage tanks; processing areas; runways, taxiways, and aprons; and storage areas exposed to precipitation).
- Develop or update storm water pollution control measures for base facilities, including recommendations for good housekeeping, preventive maintenance, spill prevention and response, inspection, training, record keeping, and reporting procedures.
- Identify areas, which, due to topography, activities, or other factors, have the potential for significant soil erosion.
- Identify acreage and permeability characteristics by percentage of surface area for each watershed that impacts Scott AFB.
- Identify areas where soil contamination due to pollutant runoff is possible or likely.
- Ensure site maps are compatible with the base's GIS that is maintained by the Scott AFB Civil Engineering Squadron. Develop a new GIS layer that can be added to the base's existing drawing system.
- Determine if non-storm water certification is required to satisfy requirements of permit.
 If required, the Contractor shall develop the certification for signature by 375th AMW/CC.
- Conduct analysis of cooling tower floor drains to determine if discharge goes to storm water or wastewater system.
- Conduct one on-site meeting with the SWPP Team. Provide training on the team's roles and responsibilities.
- Incorporate new facilities/sites into the SWPPP. New facilities are under construction now, such as the U.S. Transportation Command facility. Ensure that United States Army Corps of Engineers (USACE) projects are added to the plan as well as identified as members of the SWPP Team.
- Provide an update of the existing hydraulic model of Ash Creek incorporating recent changes. The Contractor shall use Hydrologic Engineering Centers River Analysis System (HEC-RAS) software. The 5, 10, 25 and 100-year flood events shall be run and

updated. The updated computer model shall be submitted with final report in electronic and hard copy format.

PART E - TRADITIONAL SERVICES (INCL. MILCON, MFH, AND SRM)

13.0 TITLE I TRADITIONAL SERVICES

Not applicable to this TO.

14.0 TITLE II TRADITIONAL SERVICES

Not applicable to this TO.

15.0 OTHER TRADITIONAL A-E SERVICES

The Contractor shall provide advanced A-E services of interest to the government. In addition, The Contractor shall complete renderings and design data and other project-specific work. Other professional services not necessarily connected with a specific construction project may also be required.

15.1 to 15.5

Not applicable to this TO.

15.6 Other Services

The Contractor shall provide graphics and drafting (including CADD and/or GIS) as necessary to support the effort in 12.14.2. This shall include maps, hydraulic models, and GIS databases generated during the performance of this TO. (CDRLs B011, B012)

16.0 GOVERNMENT POINTS OF CONTACT

Government POCs will be provided under separate cover.

17.0 ABBREVIATIONS, ACRONYMS, AND TERMS

Refer to the 4P A-E 08 Guidance and Resource List for the abbreviations, acronyms, and terms.



ILLINOIS AIR NATIONAL GUARD 126TH MISSION SUPPORT GROUP 2210 EAST PRIOR DR. SCOTT AFB IL 62225-5503

September 22, 2010

MEMORANDUM FOR 375 CES/CEAN

FROM: 126 MSG/EM

SUBJECT: Notice of Violation – LR-8J

The 126th Air Refueling Wing addressed three issues identified in the RCRA Section of the USEPA Notice of Violation Letter dated 16 Sep 2010.

1) At the time of the inspection, Scott AFB had not made a determination for all of the waste stored in a container located in Building 5022. (see pg 26 of the RCRA Compliance Evaluation Inspection Report, Picture 29)

This item was not labeled correctly. Prior to July 22, 2009, the 126 MXS Propulsion Shop maintained a waste stream for a parts washer which consisted of Hazardous Waste Filters. This waste stream was de-activated during the spring of 2010, and the shop turned in the final container of this waste. Subsequently, a new drum was put in place to be used to collect floor sweeping compound. This drum should have been labeled as Non-Hazardous waste. In the picture there are a couple absorbent pads which did not belong in this drum. Shop personnel have been briefed on the proper disposal of absorbent pads as well as the importance of ensuring only the actual waste intended for the specific drum be placed into the waste container. This item has been addressed and is now in compliance. (See Fig 1, Accumulation Site, 126 ARW Propulsion Shop, Bldg 5022.)

2) At the time of inspection Scott AFB had a non-hazardous waste label on a container of paint thinner rags stored in a CONEX near Building 5006; when opened, a strong solvent smell was released from the container. (See page 32 of the RCRA Compliance Evaluation Inspection Report, picture 39.)

This drum was not labeled correctly. The 126 LRS Vehicle Maintenance shop inadvertently labeled this Hazardous Waste as a Non-Hazardous Waste. The shop personnel were notified of the error, and the proper label was affixed to the drum. This waste stream was characterized in March 2006 on Waste Profile Sheet Number GH-05-064. (See Fig. 2, 126 LRS Vehicle Maintenance Accumulation Site, and Fig 3, Hazardous Waste Profile Sheet.)

3) At the time of the inspection, one 55-gallon container used to hold waste pant hazardous waste in the satellite accumulation area was open, and waste was not being added to or removed from the container. (See RCRA Compliance Evaluation Inspection REPORT, pages 28 – 29.) Scott AFB therefore failed to comply with the above mentioned condition for a storage permit exemption, and violated the storage facility container closure requirement.

The item depicted in the picture on the bottom of page 28 is actually a 30-Gal drum inside—an over pack that is used as secondary containment. The drum has a funnel which closes and latches which qualifies as a closed container. We feel the over pack is a good additional safety precaution since there is a floor drain within a few feet of this container. Shop personnel have been briefed on the proper procedures to ensure the latches on the funnel are employed anytime the funnel is not in use. (See Fig 4, 126 MXS Corrosion Control Shop, Bldg 5026 Accumulation Site.)

These were the items identified by the 126th Environmental Management Office that pertained to the 126th Air Refueling Wing. No other Notices of Violation appeared to apply to the 126th Air Refueling Wing. All of the Notices of Violations identified in the memorandum are closed. If you have any questions concerning this response, please contact me at 222-5121 or Mr. Bill Scully at 222-5188.

Kevin Jacobs, Lt Col, ILANG Environmental Manager

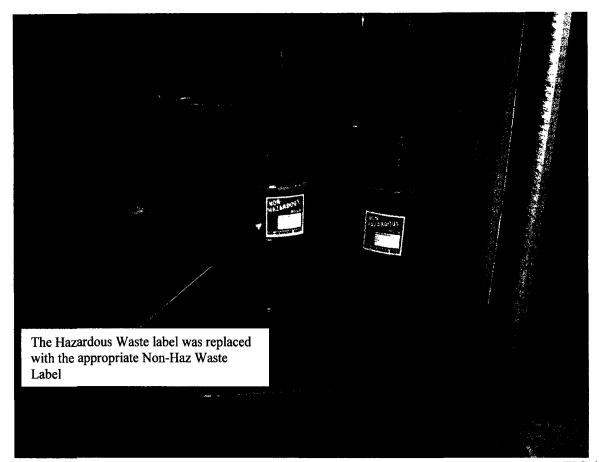


FIG # 1



Fig #2

| HA | 'RDOUS WASTE | PRO | OFILE 5 | TET | | | |
|---|---|----------|--------------------------|-------------------|---------|------------------------|--|
| A. GENERAL INFORMATION: | | | S. Jan | | | ILE NO. | en de la companya de |
| 1. GENERAL INFORMATION: | Wina | | | FB6121- | | | |
| 2. FACILITY ADDRESS: | VIN | | | | | R USEPA ID | |
| 126 Air Guard Way | 5 7ID Codes | | | iL75700 | 24177 | | |
| Scott AFB, IL | 5. ZIP Code: 62225 | | | 4. GENE 163010 | | R STATE ID | |
| 6. TECHNICAL CONTACT: Major Kevin Jacobs | | | ITLE nief. Env Mgmt | | | PHONE: 618-222-5188 | |
| B. 1. NAME OF WASTE: Paint Thinn | ier, Contaminated, Waste - V | /eh Ma | int | | | | |
| 2. USEPA/ or /STATE WASTE C | ODES DOO1 | | | | | | |
| 3. PROCESS GENERATING WA | STE CP | | | | CLIN | #: 9404 | |
| 4. PROJECTED ANNUAL VOLU | ME/UNITS | | 5. MODE | OF COLL | ECTIO | N: 1A1 | |
| 6. IS THIS WASTE A DIOXIN LIS (e.g.,F020,F | STED WASTE AS DEFINE F021,F022,F023,F027, OR F028) | | 40 CFR 26 | 1.317 | □ YE | s 🗹 no | |
| 7. IS THIS WASTE RESTRICTED | D FROM LAND DISPOSA | L? | | | ¥ YE | 8 🗆 NO | |
| HAS AN EXEMPTION BEEN GR | ANTED? | | | | □ YE | | |
| DOES THE WASTE MEET APPL | LICABLE TREATMENT 8 | TAND | ARDS? | | Y YE | s 🗆 NO | |
| | REFERENCE S | | | | | | |
| | | | e in the second | | | 1 | 1 |
| 1. MATERIAL CHARACTERIZATION | 1; (Optional - Not required Dat | (0) | 4. MATER | IAL CON | APOSIT | LION | |
| Color: | | | | NENT | CON | CENTRATION | RANGE |
| Density: | BTU/LB: N/A | | First Sam | pling Req | | | <u> </u> |
| Total Solids: Layering: | Ash Content: | | | | | | |
| 2. RCRA CHARACTERISTICS: | | \neg | <u> </u> | | | | † |
| PHYSICAL: SOLID M LIQUID S | REMI-SOLID [7] GAS | | | | | | |
| OTHER | _ | _ | TOTAL | | 10 | 10% |] |
| Ingiteable (D001) TREATMENT GRO | ✓ NON-WASTEWATER | | 5. SHIPPIN | 4G INFO | PMATI | ON∙ | |
| Flash Point: RE | EACTIVE (D003) | ĺ | | | | ON: ☑ YE8 □ |] NO |
| | J WATER REACTIVE | 1 | Proper Shipp | ing Name: | | _ | |
| LOW TOC (>10%) | CYCANIDE REACTIVE | l | Waste Paint I | | | | |
| OH. | SULFIDE REACTIVE | 1 | Hazard Clas |)6: <u> </u> | UN | or NA NOU | N1263 |
| L TOXICII | TY CHARACTERISTICS EVERSE FOR LISTING) | 1 | ADDITIONAL | | | | |
| (| VERIOL FOR CITY | \dashv | | | | JLK 🗹 DRUM [| |
| 3. CHEMICAL COMPOSITION CON | PPER NICKEL | - 1 | CERCLA REF | PORTABLE | QTY (R | Q): | |
| ZINC CHROMIUM-HEX | · · · | | | | | DE: | |
| | | ı | DOT PUBLIC SPECIAL HA | | | | |
| TOTAL HALOGENSVOL | ,ITILE | 1 | SPECIAL FIA | NDLING IIV | PORMA | TON: | |
| PCBs (OTHER) | | ſ | I. Kevin Jac | obs, Maj, IL | ANG | HEREBY | <u> </u> |
| NOTE: EXPLOSIVES, SHOCK SENSITIVE, P | YROPHORIC, RADIOACTIVE, | | CERTIFY TH | AT ALL INF | ORMATI | ION SUBMITTED | IN THIS |
| ETIOLOGICAL WASTE ARE NOT NORMALLY | Y ACCEPTED BY THE DR | | | | | S TO THE BEST (| |
| 6. GENERATOR GERTIFICATION: | | | | | | EPRESENTATION | |
| ✓ CHEMICAL ANALISYS (ATTACH TES | et Deci II TC) | 1 | SUSPECTED | HAZAROS | HAVE B | SEEN DISCLOSE | - |
| 1 | PPORTING DOCUMENTS) | 1 | nec | 117 | been | ontative D | RUG |
| MOEN NAMATERASE (VIIVOU OÓL | PORTING DOCUMENTS) | | Signature or u | 3enerators | Represe | ntative U/ | ATE |

DRMS FORM 1930, AUG 97 (EF)

(Page 1 of 4)

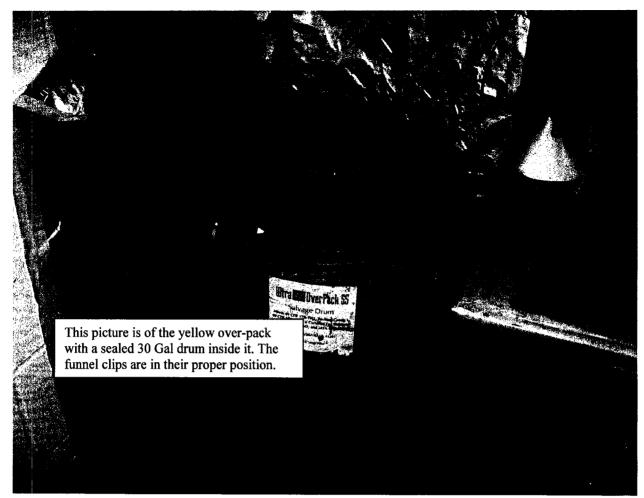


Fig # 4

SP450008D0014-0154 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 UNIFORM HAZARDOUS 1. Generator ID Number 4. Manifest Tracking Number 2. Page 1 of 3. Emergency Response Phone JJK (412) 369-5668 005389733 IL7570024177 **WASTE MANIFEST** 5. Generator's Name and Mailing Address SCOTT AFB Generator's Site Address (if different than mailing address) 375 CES/CEV ,702 HANGER RD. 618-256-2184 SCOTT AFB. IL 62225-5035 Generator's Phone: ILS FPAID Number 6. Transporter 1 Company Name Veolia ES Industrial Services, Inc. (LaPorte) TXR000077970 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address U.S. EPA ID Number American Environmental Services, Inc. (KY) 1689 Shar-Cal Road KYD985073198 270-395-0504 Calvert City, KY 42029 Facility's Phone: 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11 Total 12. Unit 13. Waste Codes and Packing Group (if any)) Quantity Wt./Vol. НМ No. Type Waste Mercury, 8, UN2809, PG-III U151 GENERATOR DF 8 P Waste Flammable liquids, corrosive, n.o.s., 3 (8), UN2924, D001 PG-III (Petroleum Distillates) DM 20 Р Waste Paint, 3, UN1263, PG-II 1000 Х DF 24 Ρ RQ, Waste Paint, 3, UN1263, PG-II (D001) 0001 F003 F005 DM 156 14. Special Handling Instructions and Additional Information 1:ERG#172: MGT-8751 - MERCURY CONTAMINATED ARTICLES 2:ERG#I32: MGT-17805 - CLEANER SOLUTION (FLAM/CORROSIVE) 3:ERG#128: MGT-2991-WG124 - HIGH BTU LIQUIDS 4:ERG#128: MGT-2991-WG124 - HIGH BTU LIQUIDS 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment. refully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Printed/Typed Name Day CARLA A. DAGGITT 08 16. International Shipments Export from U.S. Port of entry/exit: E Transporter signature (for exports only): Date leaving U.S. 17. Transporter Acknowledgment of Receipt of Materials Fransporter 1 Printed/Typed Name Day Year Sessi bear 18. Discrepancy 18a. Discrepancy Indication Space Type Quantity Partial Rejection _ Residue _ Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number GNATED 18c. Signature of Alternate Facility (or Generator) Month Day Year

Signature

Printed/Typed Name

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Month

Day

Year

4.

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

| UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet) 21. Generator ID Number IL 7570024177 22. Page 23. Manifest Tracking Number 22. Page 23. Manifest Tracking Number 25. DD5389733 JJK | | | | | | | | } | | | |
|---|------------|---|--|-------------------|--------------|--------------------------|--|--------------|-------------|------|--|
| | 24. G | enerator's Name SCOTT AFB | | | | | | | | | |
| 1 | | 375 CES/CEV | | | | | | | | } | |
| | | 702 HANGER RD. U.S. EPAID Number | | | | | | | | | |
| | 25. T | ransporter Company Name | | | | 1 | | | | 1 | |
| | 26. T | ransporter Company Name | | | | U.S. EPA ID I | Number | | | | |
| | 27a. HM | 27b. U.S. DOT Description (including Proper Shi and Packing Group (if any)) | pping Name, Hazard Class, 1D Number, | 28. Contai No. | ners Type | 29. Total Quantity | 30. Unit Wt./Vol. | 31. V | Vaste Codes | | |
| | | 5 RO Waste Flammable I | iquids, n.o.s., 3, UN1993, PG-III | | | | | D001 | 2010 | | |
| | Х | (Petroleum Distillates,Sele | • | 4 | DM | 930 | P | | | | |
| ۱ | | | acidic, organic, n.o.s., 8, UN3265, | , | | | _ | 0002 | | | |
| | Х | PG-III (Formaldehyde,Acet | tic Acid) | 1 | DF | 7 | F | | | | |
| | | 7. Waste Corrosive liquid, | basic, inorganic, n.o.s., 8, UN3266, | | | , | 1 | 0002 | | | |
| | Х | PG-III (Sodium Sulfite) | | 1 | DF | 189 | P | | | | |
| 1 | - | 8. Hazardous waste, liquid | DATE D NAMED DO N | ļ <u>.</u> | | | | D007 | | | |
| GENERATOR | Х | (Chromium) | , 11.0.5., 9, NA3002, FO-III | 1 | DF | 5 | P | 13007 | | | |
| Ä | | | | | | | | | | | |
| 뜅 | * | | ous substances, solid, n.o.s., 9, | | | 185 | ↓ p | 0007 | | | |
| $\ $ | | UN3077, PG-III (Chromiun | n) | | | - 780 | <u> </u> | | | | |
| | | 10. Hazardous waste, solic | I, n.ø.s., 9, NA3077, PG-III | | | | 100 P | 0007 | | | |
| | X | (Chromium) | | 1 | CW | 1100 | | | | | |
| | | 11 Batteries wet filled wir | th alkali, 8, UN2795, PG-III | | | | 1 | NONE | | | |
| $\ $ | X | (Universal Waste) | un aman, u. Unizrou, i U-ili | 1 | DM | 321 | P | | | | |
| | | <u> </u> | | | ļ | | | | | | |
| $\ $ | | | .T. Non-regulated (Manganese | 1 | DF | 5 | P | NONE | | | |
| | | Dioxide Batteries) (Univers | al VVaste) | | | | <u> </u> | ļ | | | |
| | | 13. Non-RCRA liquids, D.0 | O.T. Non-regulated (Used | _ | | | | NONE | • | | |
| $\ $ | | Oil,Grease) | | 1 2 | DM | 4/8 | 1 1 | | | | |
| $\ \ $ | | 14. Non-RCRA liquids, D.C | D.T. Non-regulated (Trench Sludge) | | | | 1 | NONE | | | |
| $\ $ | | , . | 2 (| 1 | DM | 480 | P | | | | |
| | 1 | pecial Handling Instructions and Additional Inform | ation | <u> </u> | <u> </u> | L | ــــــــــــــــــــــــــــــــــــــ | 1 | <u>!</u> | L | |
| П | | ERG#128: MGT-2991-WG124 ERG#153: MGT-32273 | 9:ERG#171: MGT-10140 10:ERG#171: MGT-2468-WG12 |).a | | 8:MGT-8741 4:MGT-8741 | | | | | |
| \prod | 7:8 | ERG#154: MGT-2538-WG124 | 11:ERG#I54: MGT-13464 | .4 | 1- | 4.181631-07-41 | | | | | |
| ۲ | 32 T | ER G#171: MGT-2456-WG124 ransporterAcknowledgment of Receipt or | 12:MGT-8740 f Materials | | | | | | | | |
| NEW THE | Print | ed/Typed Name | Signature | | ···· | | | Mo | onth Day | Year | |
| TRANSPORTER | - | | | | | | | | | _L | |
| ZAN | Print | ransporterAcknowledgment of Receipt or ed/Typed Name | f Materials Signature | | | | | Mc | onth Day | Year | |
| F | | | | | | | | | | | |
| | 35. Ē | iscrepancy | · —— — —— —— | | | | | | | | |
| CII ITY | | | | | | | | | | | |
| | , | | | | | | | | | | |
| VATA | 90, F | lazardous Waste Report Management Method Co | odes (i.e., codes for hazardous waste treatment, disposal, and r | ecycling systems) | | | | | | ·· | |
| DESIGNAT | - | | | | | | | | | | |
| ä | | 1 |) | i | | | i | | | | |

| Ple | | int or type. (Form designed for use on elite (| 12-pitch) typewriter.) | | | | | Approved. C | MB No. 20 | 50-0039 |
|-------------|------------|--|---|------------------------------|----------------|---------------------------------------|----------------------|-------------|-------------|----------|
| 1 | Ì | (Continuation Sheet) | 21. Generator ID Number IL7570024177 | 22. Page 3 of 3 | | est Tracking Nu 05389733 | | | | |
| | 24. G | Generator's Name SCOTT AFB 375 CES/CEV 702 HANGER RD |). | | | | | | | |
| | 25. | Transporter Company Name | | | | U.S. EPA ID | Number | | | |
| | 26. 1 | Transporter Company Name | | | · | U.S. EPA ID | Number | | | |
| | 27a. HM | 27b. U.S. DOT Description (including Proper Ship and Packing Group (if any)) | pping Name, Hazard Class, ID Number, | 28. Conta | ainers Type | 29. Total Quantity | 30. Unit Wt./Vol. | 31. Wa | iste Codes | |
| | | 15. Nan-RCRA salids, D.O w/POL) | .T. Non-regulated (Absorbani | ts 6 | MQ | 905 | P | NONE | | - |
| | | | | | | | | | | |
| | | | | | | | | | | |
| GENERATOR | | | | | | | | | | |
| PENE | | | | | | | | | | |
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| | | I Special Handling Instructions and Additional Informa 5: MGT-8740 | | | <u></u> | I | <u></u> | <u> </u> | | |
| 3750 | 33. T | Transporter Acknowledgment of Receipt of led/Typed Name | Materials | Signature | | | | Mon | h Day | Year |
| TOANGOODTED | 34. 7 | TransporterAcknowledgment of Receipt of | Materials | | | | | | _L | <u> </u> |
| ┡ | 105 6 | led/Typed Name | | Signature | | | | Mon | h Day | Year |
| VIIII | | Discrepancy Azzardous Waste Report Management Method Cor | des (i.e. codes for hazardalis westa trantmont disc | once and recusting everages | 1 | | | | | |
| DECICALAT | | Trace report management method Con | noo (noo, codes for mazardous waste deathleff, dis | posal, and recycling systems | , | | | | | |
| عًا | إذ |] | 1 | 1 | | | 1 | | | |

American Environmental Services, Inc. Land Disposal Restriction and Certification Form

Generator Name: SCOTT AFB

US EPA ID#: IL7570024177

Generator Address: 375 CES/CEV, SCOTT AFB, IL 62225-5035

Manifest Tracking Number: 005389733JJK

Waste Analysis Available: No

| Manifest Line | Profile Number | RCRA Waste Codes (List all that apply or "None" if waste stream is not regulated.) | Subcategory (See Table 2) | or WW | California List Wastes (See Table 3) | Regulated Constituents (See Tables 1, 4) | Certification (Choose from A through N) |
|------------------|-------------------|--|------------------------------|----------|--|--|---|
| 1 | MGT-8751 | U151 | 14 | NWW | | | Α |
| 2 | MGT-17805 | D001 | 1 | NWW | | | Α |
| 3 | MGT-2991-WG124 | D001 | 1 | NWW | | | Α |
| 4 | MGT-2991-WG124 | D001, F003, F005 | 1 | NWW | | 21,5 | Α |
| 5 | MGT-2991-WG124 | D001, D010 / | 1 | NWW | | | Α |
| 6 | MGT-32273 | D002 | 5 | NWW | | | Α |
| 7 | MGT-2538-WG124 | D002 | 5 | NWW | | | Α |
| 8 | MGT-2456-WG124 | D007 | 1 | NWW | | | Α |
| 9 | MGT-10140 | D007 | | NWW | | | Α |
| 10 | MGT-2468-WG124 | D007 | | NWW | | | Α |
| 11 | MGT-13464 | NONE | | | | | |
| 12 | MGT-8740 | NONE | | | | | |
| 13 | MGT-8741 | NONE | | | | | |
| 14 | MGT-8741 | NONE | | | | | |
| 15 | MGT-8740 | NONE | | | | | |

Land Disposal Restriction & Certification Form

- (A) <u>THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD</u>. This waste must be treated to the applicable performance based treatment standard set forth in 40 CFR Part 268 Subpart C, 268.32 Subpart D, 268.40 or RCRA Section 3004(d) prior to land disposal.
- (B) THIS HAZARDOUS DEBRIS IS SUBJECT TO THE ALTERNATIVE TREATMENT STRANDARDS OF 40 CFR 268.45.
- (C) THIS RESTRICTED WASTE HAS BEEN TREATED TO THE PERFORMANCE STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and base this certification upon my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- (D) THIS RESTRICTED WASTE, FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY, HAS BEEN TREATED BY THE SPECIFIED TECHNOLOGY. I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- (E) THIS RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT TREATMENT. I certify under the penalty of law that I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

| Page 2 of | 3 |
|-----------|---|
|-----------|---|

| | Generator: Scott AFB, 375 CES/CEVManifest Document | #_005389733 JJK |
|-------------|---|--|
| | THIS RESTRICTED DEBRIS HAS BEEN TREATED IN ACCORDANCE WITH 40 CF ris has been treated in accordance with the requirements of 40 CFR 268.45. I am aware that also certification, including the possibility of a fine and imprisonment. | R 268.45. I certify under penalty of law that the there are significant penalties for submitting a |
| t a f | G) THIS LAB PACK DOES NOT CONTAIN ANY WASTES IDENTIFIED AT APPENDIX hat I personally have examined and am familiar with the waste and that the lab pack contains appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in coor lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting in companion or imprisonment. | only wastes that have not been excluded under ompliance with the alternative treatment standards |
| • t | THIS RESRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remodecharacterized waste contains underlying hazardous constituents that require further treatmeaware that there are significant penalties for submitting a false certification, including the poss | ve the hazardous characteristic. This nt to meet universal treatment standards. I am |
| j | (I) THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS FOR UNDERLYING HAZARDOUS CONSTITUENTS. I certify under penalty of law that the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying has Treatment Standards. I am aware that there are significant penalties for submitting a false centimprisonment. | e waste has been treated in accordance with the zardous constituents, as defined in 268.48 Universa |
| ı | (J) <u>THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPO</u> prohibition on the type of land disposal method utilized for the waste (such as, but not limited to an exemption under 40 CFR 268.6, or a nationwide capacity variance under 40 CFR 269 Subp | o, a case-by-case extension under 40 CFR Part 268. |
| ; ; ; | (K) THIS RESTRICTED WASTE WITH TREATMENT STANDARDS EXPRESSED AS CONTO 268.43, IF COMPLIANCE WITH THE TREATMENT STANDARDS IN SUBPART DO ON THE ANALYTICAL DETECTION LIMIT ALTERNATIVE IN 268.439(c). I certify und am familiar with the treatment technology and operation of the treatment process used to support those individuals immediately responsible for obtaining information, I believe that the nonwincineration in units operated in accordance with 40 CFR Part 264 Subpart O, or 40 CFR Part substitution units operating in accordance with the applicable technical requirements, and I has constituents despite having used best good faith efforts to analyze for such constituents. I am a submitting a false certification, including the possibility of a fine and imprisonment. | F THIS PART IS BASED IN PART OR IN WHOLE or penalty of law that I have personally examined a cort this certification and that, based on my inquiry astewater organic constituents have been treated by 265 Subpart O, or by combustion in fuel we been unable to detect that nonwastewater organic |
| | (L) THIS DECHARACTERIZED WASTE CONTAINS UNDERLYING HAZARDOUS CONTREATMENT TO MEET UNIVERSAL TREATMENT STANDARDS. I certify under pena accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristics. submitting a false certification, including the possibility of a fine and imprisonment. | ty of law that the waste has been treated in |
| | (M) THIS WASTE HAS BEEN TREATED IN ACCORDANCE WITH THE REQUIREMENT HAZARDOUS CHARACTERISTIC AND THE UNDERLYING HAZARDOUS CONSTITUTE TO MEET THE 268.48 UNIVERSAL TREATMENT STANDARDS. If am aware that there are significant penalties for submitting a false certification, including the | ENTS, AS DEFINED IN 268.2(1) HAVE BEEN certify under penalty of law that the above is true. |
| • | (N) THIS CONTAMINATED SOIL DOES / DOES NOT (*CIRCLE ONE*) CONTAIN DOES / DOES NOT (*CIRCLE ONE*) EXHIBIT A CHARACTERISTIC OF HAZARI COMPLIES WITH (*CIRCLE ONE*) THE SOIL TREATMENT STANDARDS AS PREATMENT STANDARDS. I certify under penalty of law that I have personally examined operation of the treatment process used to support this certification and believe that it has bee with the treatment standards specified in 40 CFR 268.49 without impermissible dilution of the significant penalties for submitting a false certification, including the possibility of a fine and in the significant penalties for submitting a false certification, including the possibility of a fine and including | OOUS WASTE AND IS SUBJECT TO / OVIDED BY 268.49(c) OR THE UNIVERSAL and am familiar with the treatment technology and maintained and operated properly so as to comply prohibited wastes. I am aware that there are |
| | I hereby certify under penalty of law that all information submitted on this and all a true to the best of my knowledge. | ssociated documents is complete, accurate and |
| | Generator Signature: Carla Q Daggitt | Title: Environmental Engineer |
| 1 | Generator Signature: Carla Q Daggitt ed Name: CARLA A. DAGGITT | Title: Environmental Engineer Date: 8 Sep 09 |

| Table 1 - Underlyii | ng Hazardous Cor | nstituents (w/ | AES Z-Codes) |
|---------------------|------------------|----------------|--------------|
|---------------------|------------------|----------------|--------------|

| _ | A2213 | Z 070 | 1,2-DIBROMO-3- | Z137 | HEXACHLORO- | Z201 | PHYSOSTIGMINE |
|--------------|--|--------------|---|--------------|---|--------------|---|
| | ACENAPHTHYLENE | - | CHLOROPROPANE | | BUTADIENE | 7000 | SALICYLATE |
| | ACETONE | Z071 | ETHYLENE DIBROMIDE | Z138 | HEXACHLORO- | Z202 Z203 | PROMECARB PRONAMIDE |
| | ACETONE ACETONITRILE | Z072 | (1,2-DIBROMOETHANE) DIBROMOMETHANE | Z139 | CYCLOPENTADIENE HxCDDs(ALL HEXACHLORO- | Z203 Z204 | PROPHAM |
| | ACETOPHENONE | Z073 | 2,4-0(2,4-DICHLOROPHENOXY- | 2.00 | DIBENZO-O-DIOXINS | Z205 | PROPOXUR |
| i | 2-ACETYLAMINOFLOURENE | | ACETIC ACID) | Z140 | HxCDFx (ALL HEXACHLORO- | Z206 | PROSULFOCARB |
| | ACROLEIN | Z074 | O,P'-DDD | | DIBENZO-FURANS) | Z207 | PYRENE |
| Z009 | ACRYLAMIDE | Z075 | P,P'-DDD | Z141 | HEXACHLOROETHANE | Z208 | PYRIDINE |
| Z010 | ACRYLONITRILE | Z076 | O,P'-DDE | Z142 | HEXACHLOROPROPYLENE | Z209 | SAFROLE |
| 1 | ALDICARB SULFONE | Z077 | P,P'-DDE | Z143 | IODOMETHANE | Z210 | SILVEX(2,4,6-TP) |
| 1 | ALDRIN | Z078 | O,P'-DDT | Z145 | ISOBUTYL ALCOHOL | Z211 | 2,4,5-T (2,4,5- |
| 1 | 4-AMINOBIPHENYL | Z079 | P,P'-DDT DIBENA(A,H)ANTHRACENE | Z146 | ISODRIN | | TRICHLOROPHENOXY- |
| 1 | ANILINE ANTHRACENE | Z080 Z081 | DIBENZ(A,E)PYRENE | Z147 Z148 | ISOLAN ISOSAFROLE | Z212 | ACETIC ACID) 1,2,4,5-TETRACHLORO- |
| | ARAMITE | Z082 | M-DICHLOROBENZENE | Z149 | KEPONE | 2212 | BENZENE |
| i | ALPHA-BHC | Z083 | 0-DICHLOROBENZENE | Z150 | METHACRYLONITRILE | Z213 | TCDDs(ALL TETRACHLORO- |
| 1 | BETA-BHC | Z084 | P-DICHLOROBENZENE | Z151 | METHANOL | | DIBENZO-P-DIOXINS) |
| | DELTA-BHC | Z085 | DICHLORODIFLOURO- | Z152 | METHAPYRILENE | Z214 | TCDFs (ALL TETRACHLORO- |
| Z020 | GAMMA-BHC | | METHANE | Z153 | METHIOCARB | | DIBENZO-FURNANS) |
| Z021 | BARBAN | Z086 | 1,1-DICHLOROETHANE | Z154 | METHOMYL | Z215 | 1,1,1,2-TETRACHLORO- |
| Z022 | BENDIOCARB | Z087 | 1,2-DICHLOROETHANE | Z155 | METHOXYCHLOR | | ETHANE |
| Z023 | BENDIOCARB PHENOL | Z088 | 1,1-DICHLOREOTHANE | Z156 | 3-METHYLCHOLANTHRENE | Z216 | 1,1,2,2-TETRACHLORO- |
| Z024 Z025 | BENOMYL BENZENE | Z089 | TRANS-1,2-DICHLORO- ETHYLENE | Z157 | 4,4-METHYLENE BIS | *** | ETHANE TETRACIII COCETINI ENE |
| Z025 Z026 | BENZ(A)ANTHRACENE | Z090 | 2.4-DICHLOROPHENOL | Z158 | (2-CHLOROANILINE) INDENO(1,2,3-C,D)PYRENE | Z217 Z218 | TETRACHLOROETHYLENE |
| Z027 | BENZAL CHLORIDE | Z091 | 2,6-DICHLORPHENOL | Z158 Z159 | METHYLENE CHLORIDE | 2410 | 2,3,4,6-TETRACHLORO- PHENOL |
| Z038 | BENZO(B)FLORANTHENE | Z092 | 1,2-DICHLOROPROPANE | Z160 | METHYL ETHYL KETONE | Z219 | THIODICARB |
| Z029 | BENZO(K)FLUORANTHENE | Z093 | CIS-1,3-DICHLORO- | Z161 | METHYL ISOBUTYL KETONE | Z220 | THIOPHANATE-METHYL |
| Z030 | BENZO(G,H,I)PERYLENE | | PROPYLENE | Z162 | METHYL METHACRYLATE | Z221 | TIRPATE |
| Z031 | BENZO(A)PYRENE | Z094 | TRANS-1,3-DICHLORO- | Z163 | METHYL METHANSULFONATE | Z222 | TOLUENE |
| Z032 | BROMODICHLOROMETHANE | | PROPYLENE | Z164 | METHYL PARATHION | Z223 | TOXAPHENE |
| Z033 | METHYL BROMIDE | Z095 | DIELDRIN | Z165 | METOLCARB | Z225 | BROMOFORM |
| | (BROMOMETHANE) | Z096 | DIETHLENE GLYCOL, | Z166 | MEXACARBATE | | (TRIBROMOMETHANE) |
| Z034 | 4-BROMOPHENYL PHENYL | 7007 | DICARBAMATE | 2167 | MOLINATE | Z226 | 1,2,4-TRICHLORO- |
| Z035 | ETHER N-BUTYL ALCOHOL | Z097 Z098 | DIETHYL PHTHALATE 2,4-DIMETHYL PHENOL | Z168 Z169 | NAPHTHALENE 2-NAPTHYLAMINE | Z227 | BENZENE |
| Z036 | BUTYLATE | Z099 | DIMETHYL PHTHALATE | Z170 | 0-NITROANLINE | 2221 | 1,1,1-TRICHLORO- ETHANE |
| Z037 | BUTYL BENZYL PHTHALATE | Z100 | DIMETILAN | Z171 | P-NITROANLINE | Z228 | 1,1,2-TRICHLORO- |
| Z038 | 2-SEC-BUTYL-4,6- | Z101 | DI-N-BUTYL PHTHALATE | Z172 | NITROBENZENE | | ETHANE |
| ł | DINITROPHENOL (DINOSEB) | Z102 | 1,4-DINITROBENZENE | Z173 | 5-NITRO-0-TOLUIDINE | Z229 | TRICHLOROETHYLENE |
| Z039 | CARBARYL | Z103 | 4,6-DINITRO-O-CRESOL | Z174 | 0-NITROPHENOL | Z230 | TRICHLOROMONO- |
| Z040 | CARBENZADIM | Z104 | 2,4-DINITROPHENOL | Z175 | P-NITROPHENOL | | FLUOROMETHANE |
| Z041 | CARBOFURAN | Z105 | 2,4-DINITROTOLUENE | Z176 | N-NITROSODIETHLAMINE | Z231 | 2,4,5-TRICHLOROPHENOL |
| Z042 | CARBOFURAN PHENOL | Z106 | 2,6-DINITROTOLUENE | Z177 | N-NITROSODIMETHYLAMINE | Z232 | 2,4,6-TRICHLOROPHENOL |
| Z043 Z044 | CARBON DISULFIDE CARBON TETRACHLORIDE | Z107 Z108 | DI-N-OCTYL PHTHALATE P. DIMETHYLAMINOAZO- | Z178 | N-NITROSO-DI-N- | Z233 Z234 | 1,2,3-TRICHLOROPROPANE |
| Z045 | CARBONSULFAN | 2100 | BENZENE | Z179 | BUTYLAMINE N-NITROSOMETHYL- | 2234 | 1,1,2-TRICHLORO- 1,2,2-TRIFLUOROETHANE |
| Z046 | CHLORDANE (ALPHA AND | Z109 | DI-N-PROPYLNITROSAMINE | 2110 | AMINE | Z235 | TRIETHYLAMINE |
| | GAMA ISOMERS | Z110 | 1,4-DIOXANE | Z180 | N-NITROSOMORPHOLINE | Z236 | TRIS-(2,3-DEBROMOPROPYL |
| Z047 | P-CHLOROANILINE | Z111 | DIPHENYLAMINE | Z181 | N-NITROSOPIPERIDINE | | PHOSPHATE |
| Z048 | CHLOROBENZENE | Z112 | DIPHENYLNITROSAMINE | Z182 | N-NITROSOPYRROLIDINE | Z237 | VERNOLAGE |
| Z049 | CHLOROBENZILATE | Z113 | 1,2-DIPHENYLHYDRAZINE | Z183 | OXAMYL | Z238 | VINYL CHLORIDE |
| Z050 Z051 | 2-CHLORO-1,3-BUTADIENE CHLORODIBROMOMETHANE | Z114 Z115 | DISULFOTON DITHIOCARBAMATES (TOTAL) | Z184 Z185 | PARATHION TOTAL POS'S (SUM OF | Z239 | XYLENES-MIXED ISOMERS |
| Z051 | CHLOROETHANE | Z116 | ENDOSULFAN1 | ۳ 100 | TOTAL PCS's (SUM OF ALL ISOMERS OR ALL | | (SJM OF O-M- AND P-XYLENE CONCENTRATIONS |
| Z053 | BIS(2-CHLOROETHOXY) | Z117 | ENDOSULFAN 11 | | AROCLORS) | Z240 | ANTIMONY |
| } | METHANE | Z118 | ENDOSULFAN SULFATE | Z186 | PEBULATE | Z241 | ARSENIC |
| Z054 | BIS(2-CHLOROETHYL) | Z119 | ENDRIN | Z187 | PENTACHLOROBENZENE | Z242 | BARIUM |
| | ETHER | Z120 | ENDRIN ALDEHYDE | Z188 | PeCDDs (ALL PENTACHLORO- | Z243 | BERYLLIUM |
| Z055 | CHLOROFORM | Z121 | EPTC | | DIBENZO-P-DIOXINS) | Z244 | CADMIUM |
| Z056 | BIS (2-CHLOROISO- | Z122 | ETHYL ACETATE | Z189 | PeCDFs (ALL PENTACHLORO- | Z245 | CHROMIUM (TOTAL) |
| 7057 | PROPYL) ETHER | Z123 | ETHYL CYANIDE- | | DIBENZO-FURANS | Z246 | CYANIDES (TOTAL) |
| Z057 | P-CHLORO-M-CRESOL | 7124 | (PROPANENITRILE) | Z190 | PENTACHLOROETHANE | Z247 | CYANIDES (AMENABLE) |
| Z058 | 2-CHLOROMETHYL VINYL ETHER | Z124 Z125 | ETHYLBENZENE ETHYL ETHER | Z191 | PENTACHLORO- NITROBENZENE | Z248 Z249 | FLOURIDE |
| 2059 | CHLOROMETHANE | Z125 Z126 | (BIS(2-ETHYL HEXYL) | Z192 | PENTACHLOROPHENOL | Z249 Z250 | LEAD MERCURY-NONWASTE- |
| Z060 | 2-CHLORONAPHTHANENE | 0 | PHTHALATE | Z192 | PHENACETIN | حدنانا | WATERS FROM RETORT |
| Z061 | 2-CHLOROPHENOL | Z127 | ETHYL METHACRYLANE | Z194 | PHENANTHRENE | Z251 | MERCURY (ALL OTHERS) |
| 2062 | 3-CHLOROPROPYLENE | Z128 | ETHYLENE OXIDE | Z195 | PHENOL | Z252 | NICKEL |
| | CHRYSENE | Z129 | FAMHUR | Z196 | O-PHENYLENE- | Z253 | SELENIUM (NOT UHC- |
| | 0-CRESOL | Z130 | FLUORANTHENE | | DIAMINE | | тс=инс) |
| | M-CRESOL | Z131 | FLOURENE | Z197 | PHORATE | Z254 | SILVER |
| Z066 | P-CRESOL | Z132 | FORMETANATE | Z198 | PHTHALIC ACID | Z255 | SULFIDE* |
| Z067 | M-CUMENYL | Z133 | HYDROCHLORIDE | 7400 | (CAS 100-21-0) | Z256 | THALLIUM |
| Z069 | METHYLCARBAMATE CYCLOHEXANONE | Z133 Z134 | FORMPARANATE HEPTACHLOR | Z199 | PHTHALIC ANHYDRIDE (CAS 85-44-9) | Z257 Z258 | VANADIUM* ZINC* |
| 2009 | J. OLOHOMANONE | Z134 Z135 | HEPTACHLOR EPOXIDE | Z200 | PHYSOSTIGMINE | £236 | ZING |
| ı | | | | | | | |

TABLE 2 - WASTE CODES WITH SUBCATEGORIES

| Waste Codes | Subcategory Number | Subcategory |
|----------------|-----------------------|---|
| Cours | 1 | High TOC ignitable liquids |
| | 2 | Low TOC ignitable liquids managed in CWA/CWA equivalent/Class 1 SDWA systems |
| D001 | 3 | Low TOC ignitable liquids managed in non-CWA/non-CWA equivalent/non Class 1 SDWA systems |
| | 4 | Corrosive waste managed in CWA/CWA equivalent/Class 1 SDWA systems |
| D002 | 5 | Corrosive waste managed in non-CWA/non-CWA equivalent/non-Class 1 SDWA systems |
| | 6 | Water reactive |
| 7000 | 7 | Reactive cyanides |
| D003 | 8 | Reactive sulfides |
| | 9 | Other reactive wastes |
| 10.006 | 10 | Characteristic for cadmium based on extraction procedure |
| D006 | 11 | Cadmium-containing batteries |
| | 12 | Characteristic for lead based on extraction procedure |
| D008 | 13 | Lead acid batteries |
| 5000 | 14 | Low mercury (<260 ppm total mercury) |
| D009 | 15 | High mercury (>260 ppm total mercury) |
| F003 | | |
| F005 | 16 | Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone and/or methanol |
| F005 | 17 | Contains only 2-nitropropane |
| r005 | 18 | Contains only 2-Ethoxyethanol |
| 17025 | 19 | Light ends |
| F025 | 20 | Spent filters/aids and desiccants |
| 1/00/ | 21 | Anhydrous |
| K006 | 22 | Hydrated |
| U151 | 23 | Nonwastewaters that contain >260 ppm total mercury |
| 0151 | 24 | All U151 wastewaters |
| | 25 | Nonwastewaters that are residues from RMERC |
| K071 | 26 | Nonwastewaters that are not residues from RMERC |
| | 27 | All K071 wastewaters |
| P047 | 28 | 4,6-Dinitro-o-cresol |
| r04/ | 29 | 4,6-Dinitro-o-cresol salts |
| | 30 | Nonwastewaters, not incinerator or RMERC residues |
| D065 | 31 | Nonwastewaters from RMERC with less than 260 ppm mercury |
| P065 | 32 | Nonwastewaters from incinerator residues with less than 260 ppm mercury |
| | 33 | All P065 wastewaters |
| | 34 | Nonwastewaters, not incinerator or RMERC residues |
| DOOS | 35 | Nonwastewaters from RMERC with less than 260 ppm mercury |
| P092 | 36 | Nonwastewaters from incinerator residues with less than 260 ppm mercury |
| | 37 | All P092 wastewaters |
| T13.40 | 38 | 2,4-D (2,4-Dichlorophenoxyacetic acid) |
| U240 | 39 | 2,4-D (2,4-Dichlorophenoxyacetic acid) salts and esters |

TABLE 3 - CALIFORNIA LIST WASTES

- 1) PCB > or = 50 ppm
- 2) Halogenated Organic Carbon (HOC's) > or = 1000 mg/l
- 3) Nickel > or = 134 mg/l
- 4) Thallium > or = 130 mg/l

TABLE 4 - REGULATED CONSTITUENTS FOR F001 - F005

- 5) Acetone
- 6) Benzene
- 7) N-Butyl Alcohol
- 8) Carbon Disulfide
- 9) Carbon Tetrachloride
- 10) Chlorobenzene
- 11) Cresols (o, m or p isomers)
- 12) Cresylic Acid
- 13) Cyclohexanone
- 14) 1,2-Dichlorobenzene

- 15) Ethyl Acetate
- 16) Ethyl Benzene
- 17) Ethyl Ether
- 18) Isobutanol (isobutyl alcohol)
- 19) Methanol
- 20) Methylene Chloride
- 21) Methyl Ethyl Ketone 22) Methyl Isobutyl Ketone
- 23) Nitrobenzene

- 24) Pyridine
- 25) Tetrachloroethylene
- 26) Toluene
- 27) 1,1,1 Trichloroethane
- 28) 1,1,2 Trichloroethane
- 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane
- 30) Trichloroethylene
- 31) Trichlorofluoroethane
- 32) Xylene (Total)

Supplemental Block J Report

Contract Number: SP450008D0014-

Manifest Tracking Number: 005389733JJK

| Manifest Line | DO Number | DO Item Number(s) | DOT Shipping Name | # of Conts. | Cont. Type | Weight/ Volume | UOM | EPA Codes |
|------------------|-----------|-------------------|---|----------------|---------------|-------------------|-----|------------------|
| 1 | 0154 | 00001 | Mercury | 1 | DF | 8.00 | Р | U151 |
| 2 | 0154 | 00002 | Flammable liquids, corrosive, n.o.s. | 1 | DM | 20.00 | Р | D001 |
| 3 | 0154 | 00003 | Paint | 1 | DF | 24.00 | Р | D001 |
| 4 | 0154 | 00004 | Paint | 1 | DM | 156.00 | Р | D001, F003, F005 |
| 5 | 0154 | 00005 | Flammable liquids, n.o.s. | 4 | DM | 930.00 | Р | D001, D010 |
| 6 | 0154 | 00006 | Corrosive liquid, acidic, organic, n.o.s. | 1 | DF | 7.00 | Р | D002 |
| 7 | 0154 | 00007 | Corrosive liquid, basic, inorganic, n.o.s. | 1 | DF | 189.00 | Р | D002 |
| 8 | 0154 | 80000 | Hazardous waste, liquid, n.o.s. | 1 | DF | 5.00 | P | D007 |
| 9 | 0154 | 00009 | Environmentally hazardous substances, solid, n.o.s. | 1 | DM | 185.00 | Р | D007 |
| 10 | 0154 | 00010 | Hazardous waste, solid, n.o.s. | 1 | CW | 1100.00 | Р | D007 |
| 11 | 0154 | 00012 | Batteries, wet, filled with alkali | 1 | DM | 321.00 | P_ | NONE |
| 12 | 0154 | 00011 | Non-RCRA solids, D.O.T. Non-regulated | 1 | DF | 5.00 | Р | NONE |
| 13 | 0154 | 00013, 00014 | Non-RCRA liquids, D.O.T. Non-regulated | 2 | DM | 476.00 | Р | NONE |
| 14 | 0154 | 00015 | Non-RCRA liquids, D.O.T. Non-regulated | 1 | DM | 460.00 | Р | NONE |
| 15 | 0154 | 00016, 00017 | Non-RCRA solids, D.O.T. Non-regulated | 6 | DM | 905.00 | Р | NONE |

| N-HAZARDO | US WASTE PROP | E SHEET | | |
|---|---------------------------------|--|-----------------|---------------------------------------|
| | PARTI | | | |
| A. GENERAL INFORMATION WASTE PROFILE NUMBER: SN-09- 07 CLIN 99 | 004 @ \$ 0.38 NSN: | • | 9999 | |
| | | E SYMBOL / | PHONE NUMB | = D |
| GENERATOR NAME INITIAL GENERA' Scott AFB Gary Bohn | | EOLF | 256-5901 | |
| A-ACILITY ADDRESS: | - I strein O | 3. GENERATOR USE | | |
| 375 CES/CEV | | | 570024177 | |
| | 5. ZIP CODE | 4. GENERATOR STA | | |
| Scott AFB, IL | 62225-5035 | 16 | 30105014 | |
| 6. TECHNICAL CONTACT: | 7. TITLE: | | PHONE | |
| Mark McCoy | Hazardous Wa | ste Program Mana | ager 256 | -2167 |
| B. 1. NAME OF WASTE Absorbents Containing | POL | | | |
| 2. USEPA/STATE WASTE CODE(S) Non-RCRA | | | | |
| 3. PROCESS GENERATING WASTE Spill Clean-Up (| | | ····· | · · · · · · · · · · · · · · · · · · · |
| 4.11.0020122711110712101121011110 | | OF COLLECTION | DOT Cont | ainer |
| 6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN | 40 CFR 261.31 (e.g. F020, F021, | F022, F023, F026, F02 | 7, or F028)? | |
| Yes X No | of P 200/2 | (V) | | |
| 7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (40 HAS AN EXEMPTION BEEN GRANTED? | CFR 268)? | XNo | REFERENCE ST | ANDADDS |
| DOES THE WASTE MEET APPLICABLE TREATMENT STA | | No | 40 CFR 26 | |
| BOLO THE VINOTE MEET AT PERANCE THE ATTENTION | PART II | | | |
| 1. MATERIAL CHARACTERIZATION | 4. MATERIAL COMPOS | ITION | | |
| | 4. WATERIAL COWPOS | ITION | | |
| (OPTIONAL-NOT REQUIRED DATA) | COMPONI | ENIT | CONC. | RANGE |
| COLOR | Absorbents | _IN I | CONC. | 98-100% |
| DENSITY BTU/LB | Diesel, Aviation Fuel | | | 0-2% |
| TOTAL SOLIDS % ASH CONTENT | Dirt/Debris | | | 10% |
| LAYERING MULTILAYERED BILAYERED | Direction | - , , , , , , , , , , , , , , | | 1070 |
| SINGLE PHASE | | | | |
| | TOTAL 100 | (100%) | L, | |
| 2. RCRA CHARACTERISTICS | 5. SHIPPING INFORMA | _` | | |
| PHYSICAL STATE X SOLID LIQUID | DOT HAZARDOUS MATER | | XNO | |
| SEMI-SOLID GAS OTHER | PROPER SHIPPING NAME | L | | |
| | FROFER SHIFFING NAME | NOII-KONA SOIIC | 12 | |
| TREATMENT GROUP: WASTEWATER | - | | | |
| X NON-WASTEWATER | HAZARD CLASS | | U.N. NO | |
| IGNITABLE(DOO1) REACTIVE (DOC | 3) ADDITIONAL DESCRIPTIO | N | | |
| FLASH POINT°FWATER | | | | |
| HIGH TOC (>10%) CYANIDE | METHOD OF SHIPMENT | BULK | X DRUM | OTHER |
| LOW TOC (<10%) | CERCLA REPORTABLE Q | JANTITY (RQ) | | |
| CORROSIVE (D002) TOXICITY | EMERGENCY RESPONSE | GUIDE PAGE | | |
| pH CHARACTERIST | C DOT PUBLICATION 5800.4 | PAGE | EDITION (Y | (R) 08 |
| CORRODES STEEL (SEE REVERSE | SPECIAL HANDLING INFO | | ` | · |
| FOR LISTING) | | | | |
| 3. CHEMICAL COMPOSITION (ppm or mg/L) | | VES, SHOCK SENSITI | | |
| COPPER PHENOLICS | | AND ETIOLOGICAL WA | ASTE NORMALLY | • |
| NICKEL TOTAL HALOGENS | | PTED BY THE DRMO. | | |
| ZINC VOLATILE ORGANICS VOLATILE ORGANICS | (OTHER) | | | |
| PCBs CHROMIUM-HE> | (UHCs) | | | |
| 6. GENERATOR CERTIFICATION | | | | |
| BASIS FOR INFORMATION | | | | |
| CHEMICAL ANALYSIS (ATTACH TEST RESULTS) | | | | |
| X USER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS | Explain how and why these docum | ents comply with RCRA | A requirements) | |
| | | · · · · · · · · · · · · · · · · · · · | | |
| I, Gary Bonenstiehl HEREBY CERTIFY THE BEST OF MY KNOW EDGE AN ACCURATE BERDESE | HAT ALL INFORMATION IN THIS | AND ALL ATTACHED | DOCUMENTS IS | ТО |
| THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESEI OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED. | TATION OF THE WASTE TURNE | U IN TO THE DRMO. | ALL KNOWN | |
| GNATURE OF GENERATOR'S REPRESENTATIVE | | DATE | | |

5-Feb-09



TOXICITY CHARACTERISTIC LIST

Profile Number:

EFFECTIVE 25 SEP 90 - LARGE QUANTITY GENERATORS 29 MAR 91 - SMALL QUANTITY GENERATORS

| CONTAMINANT | EPA HW No. | (mg/L) | CONTAMINANT | EPA HW No. | (mg/L) | | | |
|---|---|--------|--|---|--------|--|--|--|
| ARSENIC BARIUM BENZENE CADMIUM CARBON TETRACHLORIDE CHLORDANE CHLOROBENZENE CHLOROFORM CHROMIUM O-CRESOL M-CRESOL P-CRESOL CRESOL 2,4-D 1,4-DICHLOROBENZENE 1,2-DICHLOROETHANE 1,1-DICHLOROETHYLENE 2,4-DINITROTOLUENE ENDRIN HEPTACHLOR (AND IT'S HYDROXIDE) | D004 D005 D018 D006 D019 D020 D021 D022 D007 D023 D024 D025 D026 D016 D027 D028 D029 D030 D012 D031 | | HEXACHLOROBENZENE HEXACHLORO-1,3-BUTADIENE HEXACHLOROETHANE LEAD LINDANE MERCURY METHOXYCHLOR METHYL ETHYL KETONE NITROBENZENE PENTACHLOROPHENOL PYRIDINE SELENIUM SILVER TETRACHLOROETHYLENE TOXAPHENE TRICHLOROETHYLENE 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLOROPHENOL 2,4,5-TP (SILVEX) VINYL CHLORIDE | D032 D033 D034 D008 D013 D009 D014 D035 D036 D037 D038 D010 D011 D039 D015 D040 D041 D042 D017 D043 | | | | |
| FOR DRMO USE ONLY DRMO VERIFICATION 1. DATE VERIFIED 2. RESULTS ATTACHED PH FLASH POINT: SPECIFIC GRAVITY: HALIDES (TOX): REACTIVITY: WATER REACTIVITY CYANIDES SULFIDES TCLP | | | | | | | | |

RMS FORM 1930 (Reverse)

| , | 1 2 3 4 | 5 6 7 | - | Bohnens | | | • | d Fuels | | K. Emers | | | | SN-09 | 9-07 | } |
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| | TIN | | Bldg. #: | | • | 256-5901 | 0900 | Shop Code | R923EC | Container 9417, | 9418 and | 9419. | Weights in Lbs | 558 | | |
| 4 | | STOCK | NUMBER | E & DATE (ISU): | | UNIT OF | QUANT | TY C | | | | | MENT NUMBER | ₹ | | DMO |
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| Ÿ | | Non-Haz | zardous | Waste | | | | ASSEM | BLY | | | | | | | |
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| | | DEL DIST EX | A. INCHECKE | R, NAME, DATE (T | ſſN} | | | | | B INSPECTOR, NAM | IE-STAMP, DATE (| ΓΙΝ) | Pick-up | Date: 0- | Jan-00 | : |
| | TRIC T | OTE BOX Dac 5 6 7 | Garv | Bohnens | stiel | Orr | Liaui | d Fuel | S | K. Emer | son/256-2 | 184 | | SN-0 | | |
| | T'I'N | ' ' | Bidg. # | 513 | | 256-590 [°] | - | Shop Code. | R923EC | Container 9417, | | | Container Weights in | | | ļ |
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| | TRIC 1 | OTE BOX Dac | Gary | Bohnen: 513 | | | | id Fuel | | | son/256-2 | | | SN-0 | | |
| | TRIC 1 | 5 6 7 | Gary | 513 | phone: | 256-590 | | id Fuel Shop Code: | s R923EC | K. Emer | | | Profile #. Container Werghts in Lbs. | | | DMO |
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Pick-up Date: 0-Jan-00

| | | 3-166-W | | , | | | 3• · · · · · · · · · · · · · · · · · · · | |) | 151 | | 11010 | 1, IICIII | #4 |
|--------------|-----------|---|--|--|---|--|--|--|--|--|----------------------|--|-------------------------------------|-----------|
| Plea | se pri | int or type. (Form desig | | | | · | | | | 1 | | Approved. | OMB No. 2 | 2050-0039 |
| 1 | | FORM HAZARDOUS ASTE MANIFEST | 1. Generator ID Num | ber 71.7571 | 0024177 | ż | 1-130 | ency Response | 1760 | 4. Manifest 1 | 154 | 807 | 0 SI | (S |
| | SC | nerator's Name and Mailin 75 CES/DE 42 DTT STR FOR 618- erator's Phone: | <i>5</i> | | HANGAR RO IL 62225 | 1 | 70 | s Site Address LHANGA ITT ATB | B BD C. | an mailing addres | s) | | 2225 | |
| | | apsporter 1 Company Nan | REVETEMS, | INC. | | | | | | U.S. EPA ID N | lumber | TXROOC | iasa93 | G |
| | 7. Tra | ansporter 2 Company Nar | me | | | | | | | U.S. EPA ID N | umber | | | |
| | 8. De | esignated Facility Name a | nd Site Address | BAFETY-KI | LEEN SYSTI | EMG, IN | her 3 | 72 | 16002 | · U.S. EPA ID N | lumber | | | |
| | Facili | 61 ∂ −0 lity's Phone: | | CASEYVIL | | u gees | č. | • | · • . | | | (LD9A) | .09781 | ġ |
| | 9a. HM | 1 | tion (including Proper S | Shipping Name, Haz | ard Class, ID Number | , | , | ¹ 10. Contair No. | ners Type | 11. Total Quantity | 12. Unit Wt./Vol. | 13. | Waste Code | s |
| 1 1 | H | IUSED OIL ! | AND WATER | MIXTURE REGULATI | ED) (VAC) | | | 1 | 77 | | 6 | MONE | enen errore essente en alembridante | |
| GENERATOR | | | | | | | | | | 1/20 | | | | |
| GEN | | 2. | | | | | | | | | | Majorgan de la successió e medicació estembr | natural and the second and a | |
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| Ш | | 4. | | | | | | | | | | | | - I |
| $\ $ | | | | | • | | | | | | | ********* | - | |
| | 511 | Special Handling Instruction GENERATOR'S/OFFER marked and labeled/plac Exporter, I certify that the | OR'S CERTIFICATION arded, and are in all reconstructions of this consignation. | N 1 TCENS I hereby declare spects in proper corgnment conform to to | ED SUBSECTION that the contents of the dition for transport active terms of the attact | LIENT CA nis consignment coording to applicated EPA Acknow | SHIE! are fully are cable intentional | RS AS M nd accurately de national and nat of Consent. | ECESSI escribed above ional government | e by the proper shental regulations | ipping nam | | | |
| П | Gene | certify that the waste merator's/Offeror's Printed/ | | dentified in 40 CFR | 262.27(a) (if I am a ia | | erator) or i | (D) (ITI am a sma | all quantity ge | nerator) is true. | | Мо | nth Day | Year |
| ↓ - | 16. f | international Shipments | | in the second | | Truncation I | <u> </u> | Port of or | tr/ovit | | | i | 1 16 | () |
| NT | | nsporter signature (for exp | | | | Export from U | J.S. | Port of er Date leav | | <u> </u> | <i>:</i> | | | |
| TR ANSPORTER | Trans | sporter 1 Printed/Typed N | ame | | | | nature nature | d file | 7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | - John State of the State of th | | Mo Mo | . 0 | 107 |
| E | | Discrepancy | | | ······························ | | | | | | | | | |
| | 18a. | Discrepancy Indication S | · L Quant | • | Туре | | | Residue | | Partial Re | ection | | Full Rej | ection |
| Ě | 18b. | Alternate Facility (or Gen | erator) | | | | <u>Ma</u> | nifest Reference | e Number: | U.S. EPA ID I | Number | | | |
| FACI | Facil | lity's Phone: | | | | | | | | 1 | | | | |
| ATED | 18c. | Signature of Alternate Fa | cility (or Generator) | | | | | | | | | M | onth Da | y Year |
| S. | 19, H | Hazardous Waste Report I | Management Method (| Codes (i.e., codes fo | or hazardous waste tre | eatment, disposa | l, and recy | cling systems) | | <i>j</i> / ₁ . | | | | |
| | | H)41 | | ۷. | | [3. | | | | 4 | | | | |
| | 20. E | Alternate Facility (or General Ity's Phone: Signature of Alternate Facility Waste Report I 443 4 1 Designated Facility Owner ted/Typed Name | or Operator: Certificat | ion of receipt of haz | ardous materials cove | ered by the mani Sig | fest excep | t as noted in Ite | m 18a | | | Me | onth Day | y Year |
| | A F | m 9700 00 /D 0 051 | Decide a 200 c | | | | | | | | | | | |
| ĘH, | 777 | n 8700-22 (Rev. 3-05) | rrevious editions a | ire obsolete. 👍 | | | | | | | GENE | RATOR'S | 3 INITIA | L COP |

RCRA, Item #5

RS Used Oil Services, Inc.

SERVICE ORDER

744353 No.

25903 South Ridgeland Ave. Monee, Illinois 60449 (708) 534-9300 Fax: (708) 534-9400 A ID # ILR000103184

DOT # 758189

<u>Location Performing Service</u> 4559 Wagon Wheel Rd. Roxana, IL 62084

EPA ID# ILR000144931

| Date: | | × | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |
|-------|--|---|---------------------------------------|
| | | | |

| Manifest # | |
|------------|--|
| Route # | |

| | stomer/Job Site: | Contract Name: | or: | | | |
|---|--|---|--|---|---|---|
| Address: | 102 Hanger All | Address: | | | | |
| City, State, Zip | · 34 B | City, Stat | e, Zip: | | | |
| Phone Number | Secretary Secretary | Phone N | umber: | | | |
| Purchase Orde | . <u> </u> | Job Num | ber: | ······ | | |
| Quantity | Description | Unit Price | Total | Gross | Tare | Net |
| | Non-Hazardous Used Oil Collected | | | | | |
| | Non-Hazardous Oily Water | | _ | | | |
| | Non-Hazardous Contaminated Oil Collect | eted | | | | |
| | Service Charge | | | | | |
| James State Company | Hourly Charge | | | | | |
| (5 | Drum(s): Used Oil Filters | | | | | |
| Sales of the sales | Drum(s): Non-Hazardous Solids/Liquids | 3 | | | | |
| | On-Spec Used Oil Delivered | | | | | |
| | | | | | | |
| | | | | | | <u> </u> |
| fully and accurately deaccording to applicate company and facility notify in writing RS U contained within non-Emergency Responson thereby certify that the properties exists a TSCA, 40 CFR 761. | sted under 40 CFR 261.30 - 261.33 and is non-hazardous at lescribed by the proper shipping name and are classified, pole international and national government regulations, includ does not generate waste that would require submittals of a sed Oil Services, Inc. and submit all request forms. Disposi-hazardous special waste collected in LA is subject to regulate Number: National 1-800-424-8802 T.N.R.C.C. 1-512-23 are above description is complete and accurate to the best of and that the waste is not designated a hazardous waste by the pay a late charge of 1% per month on any invoice, which is a part if the becomes necessary to initiate legal proceedings to collected in LA is subject to regulate the pay a late charge of 1% per month on any invoice, which is a part if the becomes necessary to initiate legal proceedings to collected in LA is subject to regulate the pay a late charge of 1% per month on any invoice, which is a part if the becomes necessary to initiate legal proceedings to collected in LA is subject to regulate the pay and the payone in the p | acked, marked and labe ing applicable state reg Special Waste Disposal al of such materials will ation by the LA DEQ und 9-1000 f my knowledge and abi the USEPA or any state of the under the state of | led, and are in a ulations. I herei Request Form. be performed u der LAC Gov. C lity to determine agency pursuan | Ill respects in proper by certify that to the Additionally, upon pon approval of RS hapter 41, Subpart that no deliberate t to the RCRA of 18 | er condition for tra best of our know generating such i Used Oll Service C. or willful omission 976 or contains P | insport by highway fledge, this wastes, we will es, Inc. Used oil as of compositions CB's regulated by |
| Arrival Time: | Begin Loading: | End Load | ding: | De | epart Time: | |
| Remarks: | Dogin Loading. | LIU LOA | <u></u> | | -part Time | / 10 |
| Driver Name | 3 Charte | Next Service Date: Driver Signati | | Filte | <u> </u> | 101/1 Ca |
| Office Use On | ily | Office Use | | | | |
| Payment Rece | eived From Customer Yes No (To Be Invoice | d) | | | | |
| Amount | Check Cash | Amount | | Chac | k Cach C | radit Card |

| A. GENERAL INFORMATION WASTE PROFILE NUMBER: SN-09- 10 CLIN 9904 @ \$ GENERATOR NAME Scott AFB Gary Bohnenstiel 2. FACILITY ADDRESS: 375 CES/CEV 702 Hangar Road 5. ZIP CODE | 0.40 NSN: 9999 |
|--|--|
| WASTE PROFILE NUMBER: SN-09- 10 CLIN 9904 @ \$ _ GENERATOR NAME INITIAL GENERATORS NAME Scott AFB Gary Bohnenstiel FACILITY ADDRESS: 375 CES/CEV | / OFFICE SYMBOL / PHONE NUMBER CEOLF 256-5901 |
| GENERATOR NAME Scott AFB A. FACILITY ADDRESS: 375 CES/CEV | / OFFICE SYMBOL / PHONE NUMBER CEOLF 256-5901 |
| Scott AFB Gary Bohnenstiel E. FACILITY ADDRESS: 375 CES/CEV | CEOLF 256-5901 |
| Z. FACILITY ADDRESS: 375 CES/CEV | |
| 375 CES/CEV | 3. GENERATOR USEPA ID: |
| | |
| 702 Hangar Road 5. ZIP CODE | IL7570024177 |
| | 4. GENERATOR STATE ID: |
| | 62225 1630105014 |
| o. Teorimo, te dominio | 7. TITLE: PHONE |
| Mark McCoy | Hazardous Waste Program Manager 256-2167 |
| B. 1. NAME OF WASTE Filters, Fuel | |
| 2. USEPA/STATE WASTE CODE(S) Non-RCRA | |
| 3. PROCESS GENERATING WASTE Fluid Changes (FC-CEO22) | |
| 4. PROJECTED ANNUAL VOLUME/UNITS 1000 / pounds | 5. MODE OF COLLECTION DOT Container |
| 6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN 40 CFR 261.3 | .31 (e.g. F020, F021, F022, F023, F026, F027, or F028)? |
| Yes X No | |
| 7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (40CFR 268)? | Yes X No |
| HAS AN EXEMPTION BEEN GRANTED? DOES THE WASTE MEET APPLICABLE TREATMENT STANDARDS? | X Yes No REFERENCE STANDARDS 40 CFR 268.48 |
| | |
| PART | |
| | ERIAL COMPOSITION |
| (OPTIONAL-NOT REQUIRED DATA) | |
| | COMPONENT CONC. RANGE |
| COLOR Filter Ele | |
| | n Fuel Grade JP-8 0-1% |
| TOTAL SOLIDS % ASH CONTENT | |
| LAYERING MULTILAYERED BILAYERED | |
| SINGLE PHASE | |
| TOTAL | L <u>100%</u> (100%) |
| 2. RCRA CHARACTERISTICS 5. SHIPI | PING INFORMATION |
| PHYSICAL STATE X SOLID LIQUID DOT H. | HAZARDOUS MATERIAL YES X NO |
| SEMI-SOLID GAS OTHER PROPE | ER SHIPPING NAME Non-RCRA Solids |
| TREATMENT GROUP: WASTEWATER | |
| | RD CLASS U.N. NO |
| | TONAL DESCRIPTION |
| | IONAL DESCRIPTION |
| | princip princi |
| HIGH TOC (>10%) CYANIDE METHO | OD OF SHIPMENT BULK X DRUM OTHER |
| LOW TOC (<10%) SULFIDE CERCL | LA REPORTABLE QUANTITY (RQ) |
| CORROSIVE (D002) TOXICITY EMERG | GENCY RESPONSE GUIDE PAGE |
| | PUBLICATION 5800.4 PAGE EDITION (YR) 04 |
| <u> </u> | IAL HANDLING INFORMATION |
| FOR LISTING) | |
| 3. CHEMICAL COMPOSITION (ppm or mg/L) | NOTE: EXPLOSIVES, SHOCK SENSITIVE, PYROPHORIC, |
| COPPER PHENOLICS | RADIOACTIVE, AND ETIOLOGICAL WASTE NORMALLY |
| NICKEL TOTAL HALOGENS | ARE NOT ACCEPTED BY THE DRMO. |
| ZINC VOLATILE ORGANICS (OT | THER) |
| PCBs CHROMIUM-HE> (U | JHCs) |
| 6. GENERATOR CERTIFICATION | |
| BASIS FOR INFORMATION | |
| CHEMICAL ANALYSIS (ATTACH TEST RESULTS) | |
| | and why these documents comply with PCPA requiremental |
| XILISER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS Evaluin hours | ana wny mese documents compty with KOKA requirements) |
| USER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS-Explain how a | |
| | TORMATION IN TURN AND A STATE OF THE STATE O |
| I, Gary Bohnenstiel HEREBY CERTIFY THAT ALL INFO | FORMATION IN THIS AND ALL ATTACHED DOCUMENTS IS TO |
| | FORMATION IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE WASTE TURNED IN TO THE DRMO. ALL KNOWN |
| I, Gary Bohnenstiel HEREBY CERTIFY THAT ALL INFO | FORMATION IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE WASTE TURNED IN TO THE DRMO. ALL KNOWN . IDATE |

TOXICITY CHARACTERISTIC LIST

Profile Number:

SN-09- 10

EFFECTIVE 25 SEP 90 - LARGE QUANTITY GENERATORS
29 MAR 91 - SMALL QUANTITY GENERATORS

| CONTAMINANT | HW No. (mg/L) | | CONTAMINANT | EPA HW No. | (mg/L) |
|--|---|---------------|---|---------------|--------|
| ARSENIC BARIUM X BENZENE CADMIUM CARBON TETRACHLORIDE CHLOROBENZENE CHLOROFORM CHROMIUM O-CRESOL M-CRESOL P-CRESOL CRESOL 2,4-D 1,4-DICHLOROBENZENE 1,2-DICHLOROETHANE 1,1-DICHLOROETHYLENE 2,4-DNITROTOLUENE ENDRIN HEPTACHLOR (AND IT'S HYDROXIDE) | D004 D005 D018 D006 D019 D020 D021 D022 D007 D023 D024 D025 D026 D016 D027 D028 D029 D030 D012 D031 | PA FOR DRM | HEXACHLOROBENZENE HEXACHLORO-1,3-BUTADIENE HEXACHLORO-1,3-BUTADIENE HEXACHLOROETHANE LEAD LINDANE MERCURY METHOXYCHLOR METHYL ETHYL KETONE NITROBENZENE PENTACHLOROPHENOL PYRIDINE SELENIUM SILVER TETRACHLOROETHYLENE TOXAPHENE TRICHLOROETHYLENE 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLOROPHENOL 2,4,5-TP (SILVEX) VINYL CHLORIDE IRT III O USE ONLY ERIFICATION | D032 | |
| | Υ | CYAN | IFIC GRAVITY: HA | | |

RMS FORM 1930 (Reverse)

| Plea | ase | print or type. (Form design | ned for use on elite (12-pitch) typewriter.) | SR45000 | | | | 14.40. 25.44 | | Approved. O | MB NO. 20: | 100-0039 |
|-------------|-------------|---------------------------------------|--|--|-------------------------------|------------------------------|-------------------|-----------------------|---------------|---------------|------------------|--|
| ↑ | U | NIFORM HAZARDOUS WASTE MANIFEST | 1. Generator ID Number 11. 7570024 177 | 1 | 3 (41) | gency Response 2) 369-566 | 8 | | 53 <u>8</u> 9 | 9807 | <u> </u> | K_ |
| Щ | 5. | Generator's Name and Mailin | g Address | | Generato | r's Site Address (| if different that | n mailing addres | ss) | | | |
| | 1 | | 375 CES/CEV, 702 I | HANGER PO | | | | | | | | |
| | ŧ | 818-259-2184 | SCOTT AFB. IL 622 | | | | | | | | | |
| TI. | GE | enerator's Phone: | 50.07 (AFD. 0. 042 | ###################################### | | | | | | | | |
| 11 | 6. | Transporter 1 Company Nam | ie . | | | | | U.S. EPA ID I | Number | | | |
| 11 | 1 | Kingston Environ | mental Services | | | | | | MORE | J050436 | 3 6 3 | |
| | 7. | Transporter 2 Company Nam | ne | | | | | U.S. EPA ID N | Number | | | |
| | Į | | | | | | | l | | | | |
| \prod | 8. | Designated Facility Name an | | | | | , | U.S. EPA ID I | Vumber | | | |
| 11 | | | Amencan Environ | mentai Servic | æs, inc () | K 7 ! | | | | | | |
| 11 | | 270-395-0504 | 1689 Shar-Cal Ro | ad | | • | • | | e di∭g | 98(50)7 Fr | 96 | |
| 11 | F | acility's Phone: | Calvert City, KY 4 | 2029 | | | | 1 | | | | |
| 11 | \vdash | · · · · · · · · · · · · · · · · · · · | ion (including Proper Shipping Name, Hazard Cla | ss, ID Number, | | 10. Contair | ners | 11. Total | 12. Unit | 40.14 | | |
| 11 | - | and Packing Group (if | | | | No. | Туре | Quantity | Wt./Vol. | 13. W | aste Codes | |
| Ш | ┢ | 1. 550 (2000) | Paint, 3. UNI1263, PG-II (DI | 004: | | ···· | | | | 0001 | | |
| 8 | | Frida Francis | ാ അങ്ങം, യാ. പുറെ ഉഷ്യായം, ത്യാത്തു ഉപത | JO () | | 4 | 618.2 | يعري | <i>2</i> | (353)34 1 | | |
| IJ | | * \ | | | | - | DM | 197 | " | | 1 | |
| GENERATOR | ! | 2. 181 | imable liquids, n.o.s., 3, UN | 3 CSO 3 CO CO 1 1 2 C | ن ـــــا الحسر المورة | | | | † - | Sons | | |
| 8 | 3 | Avalate Flam | imable ildulas, n.o.s., 3, UN | 1993, PD-1 (C | .onodian) | | | - 1 | 32 | 308 | | |
| 11 | 1 | ^) | | | | ٠, | CF | 용 |) - | | | |
| | \vdash | 3. | | 2 13 1 1 1 M 2 1 M | | | | | 1 | | | |
| | | . Waste Calo | ium hypochionte, dry , 5 1, | | · i (| | | and to | 1 | 3001 | | |
| * | | | RECEI | VED | |) | OF I | 53 | | | | |
| П | H | 4. 3.4.4 | | | | | | | + | | | |
| П | | /Vaste Flam | mable liquids, n.o.s. 3, Ubl Distillates) JAN | 7/110 | | | | | | (bH). | | |
| Ш | | * (Petroleum | (Distributes) | 1 - | | : | EMA) | 6 3 | <u>پر</u> | | ĺ | |
| Ш | 1 | Special Handling Instruction | ns and Additional Information | | | L | | | | | | |
| Ш | | 1. ER G#120: MGT-250 | 92-WG124 HIGH STU LIQUIDS (| DP (SM. CONTAI | MER 3 | .1 | | | | | pt p | 18 |
| -11 | | | 92-WG124 - HIGH ƏTU LIQUIDS (| JP (SM C(INTA | MEP 5) | 11. | 2 | and the second second | -7 | 17 | -($-$) | // No. |
| Ш | | | 344 CALCIUM HYPOCHLORITE | nyanni samin a samanna ana sa | a a comment | Kull | 1,- | | Bill | How | 111 | |
| -11 | | | 92-WG1241 HIGH BTU LIQUIDS (DR'S CERTIFICATION: I hereby declare that the | | | and accurately-de | scribed above | by the proper s | hipping name | and are class | sified, packar | aged. |
| - | 1 | marked and labeled/place | arded, and are in all respects in proper condition | for transport according t | to applicable inte | ernational and nati | | | | | | |
| -11 | f | | contents of this consignment conform to the terr nimization statement identified in 40 CFR 262.27 | | | | all quantity ger | nerator) is true | | | | |
| - | G | Generator's/Offeror's Printed/T | | (a) (ii r ain a laige quar | Signature | | | | | Mont | h Day | Year |
| 11 | | CARLA A. | DAGGITT | | 1 Can | en O | Daa | 0190 | | 10. | 11/3 | 170 |
| Ë | . 7 | 6. International Shipments | | Π. | | | 1/1 | 7 | | | <u> </u> | تـــــــــــــــــــــــــــــــــــــ |
| E | [T | Fransporter signature (for exp | Import to U.S. | L_J Expor | rt from U.S. | Port of en Date leavi | | | | | | |
| ٩ | - | 7. Transporter Acknowledgme | | | | | | | | | | |
| Į, | | ransporter 1 Printed/Typed Na | ame | | Signature | | | | | Mont | h Day | Year |
| 18 | 2 | Day W | News | | 10° | 4 12 | يہ الن مند أبراً | | | 101 | 113 | 1/0 |
| NA | įT | ransporter 2 Printed/Typed N | ame | | Signature | <u></u> | | | | Mon | th Day | Year |
| TEANSPORTER | 2 | | | | | | | | |] | 1 | 1 |
| 1 | 1 | 8. Discrepancy | | | | | | | | | | |
| -11 | 1 | 8a. Discrepancy Indication Sp | pace Quantity | Туре | | Residue | | Partial Re | oicetion | Г | Full Reje | nation |
| - | . } | | Quantity | туре | L | residue | | L Paruai Ri | ejection | L | ruii Reje | 3CUOF1 |
| - [] | | | | *** | N | lanifest Reference | e Number: | | ٠, | | | |
| ĮÈ | [| 8b. Alternate Facility (or Gene | erator) | | | | | U.S. EPA ID | Number | | | |
| EACII ITY | 5 | | | | | | | | | | | |
| 4 | 5 F | acility's Phone: | | * | | | | 1 | | | * | |
| | 3 7 | 8c. Signature of Alternate Fac | cility (or Generator) | | - | | | | | Mor | nth Day | / Yea |
| N | 3 | | | | | | | | | 1 | 1 | 1 |
| 12 | Toloival ED | 9. Hazardous Waste Report 1 | Management Method Codes (i.e., codes for haza | rdous waste treatment, | disposal, and re | cycling systems) | | | | | | |
| ĬĬ | Ú | 11. | 2 | | 12 | | | 4. | 1.1 | | | |
| | | HILL | HILL | | / / | 141 | | | 11-4 | Į. | | |
| | | 20. Designated Facility Owner | | | | - 75 | | | | | | |
| 7 | -1^2 | | of Operator: Certification of receipt of hazardous | materials covered by the | he manifest exce | ept as noted in ite | m 18a | | | | | |
| | | Printed/Typed Name | or Operator: Certification of receipt of hazardous | materials covered by t | he manifest exce Signature | ept as noted in ite | m 18a | | | Mon | ith Day | Year |

| Plea | asę pri | nt or type. (Form designed for use on elite (| 12-pitch) typewriter.) | | | *** | | | Approved. | OMB No. 2 | 2050-0039 |
|-------------|------------|--|---|---------------------------------|--|--|-----------------------|----------------------|--|-------------|-------------|
| † | | ORM HAZARDOUS WASTE MANIFEST | 21. Generator ID Number | | 22. Page | 1 | est Tracking Nur | | | | i |
| | _ | (Continuation Sheet) | 11.7570074177 | * | 2013 | 00 | 5389807 <u>J</u> | .thr. | | | |
| | 4. G | enerator's Name SCOTT AFE | | | | | | | | | |
| | | 375 JES/JEV | | | | | | | | | |
| T | | 702 HANGER RE | <u> </u> | | | | U.S. EPA ID I | lumbar | | | |
| | 25. 1 | ransporter Company Name | | | | | U.S. EFAID 1 | AUTIDE | | | |
| | 26. T | ransporter Company Name | | ** • | | | U.S. EPA ID I | Number | | | |
| ١ | <u> </u> | | | | <u> </u> | | J | _ | | | |
| | 27a. HM | 27b. U.S. DOT Description (including Proper Shi and Packing Group (if any)) | pping Name, Hazard Class, ID No | umber, | 28. Conta | Type | 29. Total Quantity | 30. Unit Wt./Vol. | 31. | Waste Codes | |
| | | 5. Waste Solids containing | flammable heuid, r | 10.3. 3.7 | | | | | 0001 | | |
| | 4,7 | UN3175 PG-II (Perroleum | · | | <i>१</i> -५ | CA.f | 1.15 | P | | | |
| | | 6 Waste Formic and 6 (3) | UN1779 PG-1 | | 7 2- 1, | | | | 13663 | | |
| | ź. | | | | ** ** | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | <i>30</i>) | ÇP | ,, <u>, , , , , , , , , , , , , , , , , ,</u> | | |
| 1 | | 7. Waste Companye liquid. | amintee regression of the | s a limigore | | | | | 60007 | | |
| ١ | Ý | P3-1 (Olycolic Aga) | and the second of the second o | ar i ser Narra da anganasa. | | DF | ά 4 . | P | | | |
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| GENERATOR | × | f Vvasce Triumbroacelic ec | च्या, इ. चार्यामध्य, म्यूट | - '} | 1 | شۇن شۇن | 10 | p | D:W2 | | |
| E | | 3. Hazardoua waste lagilia. | | , and 100 g . 1 g | | | | <u> </u> | | | |
| 9 | \ * | i a. mazardoua wasie i awiji. I Dadmium Seleniumi | 093 M. (4830): | er (Carolina) | ; | Ch4 | 9 6 | E. | 006 | Dátá | |
| | | Compared the state of the state | | | | ~ 1V. |) | 1 | ſ | } | |
| | Г | 10 Hazardous vasete, solid | nna d MakATT | DOMESTIC CONTRACTOR | | | | | 366 5 | | - |
| | ×. | The Committee of the Co | e de la companya de l La companya de la companya de | . ಕರ್ಮಿಗಳಿಕ ನಿರ್ವಧಿಗಳು | ; | Of I | .76 | F | 23.000 | ļ | |
| | <u> </u> | | · | | | | ļ <u>.</u> . | <u> </u> | | | |
| 1 | | 11. Waste Environmentally | hazardous aunstar | wes, saird nale : | | T.F | 14 F | • | POF | | } |
| | <u> </u> | 9 UM3077, PG-III AVS-ta- | Fig. s | | • | | | | <u> </u> | · | · · · · · |
| | \vdash | 3 % . 4 c | | | | | | | | | |
| ł | : | 12 Waste Phenol solution a | 5.1 UNIMET PG | , Î. | ; | ್ರ೯ | i tù | | 1085 | | |
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| 1 | 1 | | i approved a see in Esperation | ಕರ್ಮಾಟಕ ಕಡ್ಡಾಕ್ಕಾರ್. | 4 | Ç.C | \$ | ţ: | 17,15 % % | | |
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| | | 14 Hart Paris Industry Co. C | ्रे (सम्भागनसङ्ग्रह्मान्त्रेश्च | Purgene Indice | | ĺ | | | अन्यसम् | | |
| | | Saution | | | ÷ | C. P. | 30 | -3 | | ļ | ********** |
| | 32. S | pecial Handling Instructions and Additional Informa | | | | <u> </u> | | <u> </u> | <u> </u> | <u> </u> | |
| | | F S#1321 MRT-1430 | | 1. 静的不通大器 | | 1.5 | 5P。碘1克 | 467 - 779 | | | |
| ١ | | RG#153 ANGT-1228A RG#153 (AIGT-1228A) | | 71: MGT-10140 71: MGT-27852 | | 1 1 | terribati | | | | |
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| œ. | _ | ansporterAcknowledgment of Receipt of d/Typed Name | | | | | | | | | |
| TRANSPORTER | r unæ | wrigpou Harrio | | Signature | | | | | Mo | onth Day | Year |
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| FACILITY | | | | | | | | | | | |
| ₹ | | | | | | | | | | | |
| | | azardous Waste Report Management Method Coo | les (i.e., codes for hazardous was | ste treatment, disposal, and re | cvcling systems) | | | | | | |
| ō | | Hum Hi | ul | Hill | | Hlus | | 1 4 | HILL | \$ | ; |
| DESIG | | | | . 11 | _ | | | | | • | |
| | <u> </u> | HALL HILL H | 141 | 14141 | | 1411 | -41 | | 1413 | ش | |

| P16 | . | int or type. (Form designed for use on elite | 21. Generator ID Number | | 22. Page | 23 Manif | est Tracking Nur | | Approved. | UNID NO. 2030-0 | 7033 | |
|---------------|--|--|---|---|--------------------|--|--|--|-----------------|-----------------|-------------|--|
| 1.1 | UNIF | FORM HAZARDOUS WASTE MANIFEST (Continuation Sheet) | 12. Generator in Number | | 3 of 3 | | 53399907J | | | | | |
| | 24.0 | Generator's Name SOOTT AFE | Co. | | | 147 110 | The second secon | | | | _ | |
| | 74. G | | | | | | | | | | | |
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| T | <u> </u> | TOO HANGER BE | 3 | | | | U.S. EPA ID I | lumber | | | \neg | |
| Ш | 25. 1 | Fransporter Company Name | | | | | i | | | | | |
| | 26. T | Transporter Company Name | lumber | | | | | | | | | |
| | 27a. | 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)). | | | 28. Conta | iners Type | 29. Total Quantity | 30. Unit Wt./Vol. | 31. Waste Codes | | | |
| | | 15 Non-RCRA liquids, D.C.T. Non-regulated (Later Paint | | | | Liki | 519 | ê | NONE | | | |
| 7 | <u> </u> | | | | 3 | | | | | | | |
| | | 16 Non-RCRA riquids, D C | i Ti Non-regulated (| (CS200 Salvent) |) 9 4-1, } | ZM: | 34 | 2 | MONE | | **** | |
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| ATOR | | 10 Hom FCRA solids, G-O | Т Нол-гединаед | Musomarisi | 8 12 | Okt | | = | MO95 | | | |
| GENERATOR | | and spine themps and a control | * | | | | 7501 | | As the sec | | | |
| ا | | 19 Man-ROBA selids 0.0 bicerbonate | ं ः अस्ति अस्ति अस्ति स्थानि व्यक्ति स् | Description | | 3 44 | 1 296 | F) | NOME | | | |
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| | | Special Handling Instructions and Additional Inform 교환경기술문화 | | i - | | | | | | | | |
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| | | NATT-STAY | | - | | | | | | | | |
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| 40 | Print | 33. TransporterAcknowledgment of Receipt of Materials Printed/Typed Name Signature | | | | | | | | nth Day Y | /ear | |
| 9 | | | | | | | | | | , ' | | |
| dy | 34. T | 34. Transporter Acknowledgment of Receipt of Materials | | | | | | | | | | |
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| 1 | 35. Discrepancy | | | | | | | | | | | |
| EACH | FACILITY (PACILITY (PACILI | | | | | | | | | | | |
| | azardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | | | | |
| DESIG | | and the state of t | | ste treatment, disposal, and i | recycling systems) | ٠. | | | · | | | |
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| SUE RELEASE/RECEIPT DOC(5) 25. NATIONAL 24. DO STOCK NO. 8 8 ADD (8-22) (77 | Absorbents c/w, POL, Antifree Material NSN: Phin00009904 NSN: 99995N-09-429652 Profile #: SN-09-42 Constituents: 1 Absorbents, 95-100% 2 POL, Antifreeze, | eze 14 x 55 DM | | Non-RCRA Solids 17 ITEM NOMENCLATURE Absorbents c/w, POL, Antifreeze 18 TY CONT | | | | | | |
| 27. ADDITIONAL DATA 26. RIC (4-F ui (23-24) QTY (25-29) QTY (25-29) QTY (25-56) QTY (25-56 | | Storage Location: Bldg 3306 Bay ASD: 17-Nov-09 (Julian Date is EPA Waste Codes: None Total Containers: 1 naterials are properly classified, described, packs ondition for transportation according to the appli | | Cont. #' | s: (| 9-652 | 1000 | , LOOOY, | 10015 | PerFORM (DLA) |

XCXA, Tell #

| Mark McCoy Mazardous Waste Program Manager 256-2167 | 1 | NC - I-HA | ZARDOL | JS WA | STE P | ROF | SHEET | | | |
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| SOUTATE BRYANDE BY CEOIP 256-2683 SOUTATE BRYANDESS COUNTY ADDRESS | | | | | | | | 5000 | | |
| Scott AFB FACILITY ADDRESS: 3. GENERATOR USEPA ID. 3. TECHNICAL CONTACT: SCOTT AFB SCOTT AFB S. ZIP CODE S. TECHNICAL CONTACT: Mark McCoy ABSOrbents Containing POL, Antifreeze Non-RCRA S. TREATMENT WASTE CODE(S) S. TREATMENT WASTE WASTE WASTE CODE(S) S. TREATMENT WASTE W | WASTE PROFILE NUMBER: | SN-09- 42 | CLIN 99 | <u>04</u> @ \$ | 0.38 | NSN: | | | | |
| ACILITY ADDRESS 37 CESICEV 702 Hangar Rd Sort APB SOL | GENERATOR NAME | INI | TIAL GENERAT | ORS NAME | . / | OFFIC | E SYMBOL | / PHO | NE NUMB | ER |
| Type Street Str | Scott AFB | | Bryan Rol | oerts | | С | EOIP | 2 | 56-2683 | • |
| TOZ Hangar Rd S.21P CODE 4, GENERATOR STATE (ID: 1630108014 16 | FACILITY ADDRESS: | | | | | | 3. GENERATOR | R USEPA ID: | | |
| SCORT AFF SCAN AND STEMARY SECRETIST THAT ALL INFORMATION SOLD FROM THE PRODUCT OF THE PROPER SHIPTION SOLD FOR SOLD FROM THE PROPER SHIPTION SOLD FROM THE | 375 CES/CE | V | | | | | | IL757002 | 4177 | |
| SCORT AFF SCAN AND STEMARY SECRETIST THAT ALL INFORMATION SOLD FROM THE PRODUCT OF THE PROPER SHIPTION SOLD FOR SOLD FROM THE PROPER SHIPTION SOLD FROM THE | 702 Hangar | Rd | 5 | . ZIP CODE | | | 4. GENERATOR | R STATE ID: | | · · · · · · · · · · · · · · · · · · · |
| 3 TECHNICAL CONTACT: Mark MCCOy 3. 1. NAME OF WASTE Absorberts Containing POL, Antifreeze 2. USEPANSTATE WASTE CODE(S) Non-RCRA 3. PROCESS GENERATING WASTE SPIII Clean-Up (SC-CEO11A-02) 4. PROJECTED ANNUAL VOLUMEUNITS 200 / Pounds 5. MODE OF COLLECTION DOT Container 6. IS THIS WASTE A DIZNIN LISTED WASTE A DEFINED IN 40 CFR 26897 A. PROJECTED ANNUAL VOLUMEUNITS 200 / Pounds 5. MODE OF COLLECTION DOT Container 6. IS THIS WASTE A DIZNIN LISTED WASTE AS DEFINED IN 40 CFR 26897 A. PROJECTED ANNUAL VOLUMEUNITS 200 / Pounds 5. MODE OF COLLECTION DOT Container 6. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (400 FR 26897 A. PROJECTED ANNUAL VOLUMEUNITS 200 / Pounds 5. MODE OF COLLECTION DOT CONTAINER 6. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (400 FR 26897 A. PROJECTED ANNUAL VOLUMEUNITS 200 / Pounds 5. MODE OF COLLECTION DOT FO28, F | | | | | 62225 | | | 1630105 | 014 | |
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| 2. USEPASTATE WASTE CODE(S) 3. PROCESS GENERATING WASTE 4. PROJECTED ANNUAL VOLUME/UNITS 5. STHIS WASTE A DICKIN LISTED WASTE AS DEFINED IN 40 CFR 2613 (e.g. PO2D, FO21, FO22, FO23, FO26, FO27, or FO28)? 7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (49CFR 268)? 7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (49CFR 268)? 1. MATERIAL CHARACTERIZATION (OPTIONAL-NOT REQUIRED DATA) COLOR COLOR DENSITY BTIVLS TOTAL SOLIDS ASH CONTENT LAYERING SINGLE PHASE SINGLE PHASE SINGLE PHASE TOTAL 100% (100%) 1. MATERIAL CHARACTERISTICS PHYSICAL STATE SINGLE PHASE SINGLE PHASE SINGLE PHASE TOTAL 100% (100%) 1. MATERIAL CHARACTERISTICS PHYSICAL STATE SINGLE PHASE TOTAL 100% (100%) SIGNITABLE(DO01) SIGNITAB | | Absorbents (| Containing F | OL. Anti | | | | | | |
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| 6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN 40 CFR 281,31 (e.g. F020, F021, F022, F023, F028, F027, or F028)? 7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL (ADCFR 288)? HAS AN EXEMPTION BEEN GRANTED? Yes No ABSTERIAL CHARACTERIZATION (PTIONAL-NOT REQUIRED DATA) COLOR BETUILB COMPONENT CONC. RANGE POL, Antifreeze COMPONENT COMPONEN | | | | | | 5 MODE C | DE COLLECTION | DO | OT Cont | ainer |
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| TOTAL SOLIDS | COLOR | | | | | | | | | |
| AVERING MULTILAYERED BILAYERED SINGLE PHASE SINGLE PHASE | DENSITY | | | POL, A | ntifreeze | : | | | | 0-5% |
| SINGLE PHASE CATAL 100% (100%) | TOTAL SOLIDS | | | | | | | | | |
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| IGNITABLE(DOO1) REACTIVE (DOO3) ADDITIONAL DESCRIPTION FLASH POINT F WATER HIGH TOC (>10%) CYANIDE METHOD OF SHIPMENT BULK X DRUM OTHER CORROSIVE (DDO2) TOXICITY EMERGENCY RESPONSE GUIDE PAGE DOT PUBLICATION 5800.4 PAGE EDITION (YR) 8 CORROSIVE (DDO2) STEEL (SEE REVERSE FOR LISTING) 3. CHEMICAL COMPOSITION (ppm or mg/L) NOTE: EXPLOSIVES, SHOCK SENSITIVE, PYROPHORIC, COPPER PHENOLICS RADIOACTIVE, AND ETIOLOGICAL WASTE NORMALLY ARE NOT ACCEPTED BY THE DRMO. ZINC VOLATILE ORGANICS (OTHER) (UHCs) 6. GENERATOR CERTIFICATION BASIS FOR INFORMATION X CHEMICAL ANALYSIS (ATTACH TEST RESULTS) X USER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS-Explain how and why these documents comply with RCRA requirements) I, Bryan Roberts HEREBY CERTIFY THAT ALL INFORMATION IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THE WASTE TURNED IN TO THE DRMO. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED. SIGNATURE OF GENERATOR'S REPRESENTATIVE | | L | _ | FROI | - LIV OITHER | ING NAME | NOIT-KOKA | Jones | · | , |
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RMS FORM 1930

TOXICITY CHARACTERISTIC LIST

Profile Number:

SN-09- 42

EFFECTIVE 25 SEP 90 - LARGE QUANTITY GENERATORS
29 MAR 91 - SMALL QUANTITY GENERATORS

| CONTAMINANT | EPA HW No. | (mg/L) | CONTAMINANT | EPA HW No. | (mg/L) | | | | |
|--|--|-----------|--|--|--------|--|--|--|--|
| ARSENIC BARIUM X BENZENE CADMIUM CARBON TETRACHLORIDE CHLOROBENZENE CHLOROFORM CHROMIUM O-CRESOL M-CRESOL P-CRESOL CRESOL 1,4-DICHLOROBENZENE 1,2-DICHLOROETHANE 1,1-DICHLOROETHYLENE 2,4-DINITROTOLUENE ENDRIN HEPTACHLOR (AND IT'S HYDROXIDE) 1. DATE VERIFIED 2. RESULTS ATTACHED | D004 D005 D018 D006 D019 D020 D021 D022 D007 D023 D024 D025 D026 D016 D027 D028 D029 D030 D012. D031 | · FOR DRM | HEXACHLOROBENZENE HEXACHLORO-1,3-BUTADIE HEXACHLOROETHANE LEAD LINDANE MERCURY METHOXYCHLOR METHYL ETHYL KETONE NITROBENZENE PENTACHLOROPHENOL PYRIDINE SELENIUM SILVER TETRACHLOROETHYLENE TOXAPHENE TRICHLOROETHYLENE 2,4,5-TRICHLOROPHENOL 2,4,5-TP (SILVEX) VINYL CHLORIDE ART III O USE ONLY ERIFICATION | D032 NE D033 D034 D008 D013 D009 D014 D035 D036 D037 D038 D010 D011 D039 D015 D040 D041 D042 D017 D043 . ' | | | | | |
| pHFL | ASH POIN | NT: SPEC | CIFIC GRAVITY: | HALIDES (TO | OX): | | | | |
| REACTIVITY: WATER REACTIVI | TY _ | CYAN | NIDES SULF | IDES | | | | | |
| TCLP | | | | | | | | | |
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| ` | , | r Production Shop Code R900IT | K. Emerson/256-2184 Container 9-652 | Profile #. SN-09-42 Container 158 Lbs: |
|--|---|--|---|--|
| SSUE/TURN-IN DOCUM | STOCK NUMBER UNIT OF QUANTITY NSN NIIN ADDN ISSUE | 28 29 158 1 x 55 | ACT ORG SHOP 30 31 32 33 34 35 | 0-36526 9652 H |
| URN-IN | D. PART NUMBER/MFGR CODE OR NAME/REMARKS X | Absorbents c/w | , POL, Antifreeze | |
| ISSUE/T | WORK ORDER TEX. CON. FAQ SD. PROJECT PRI REQ DEL DT SHIP TO 51 51 54 55 56 57 58 59 60 61 AT 4S 48 49 50 52 53 53 56 57 58 59 60 61 AT 62 63 64 | UUC DOCUMENT NL 65 66 67 68 69 70 71 | IMBER POST/POST | T.O PSC AND/OR ERRC CLIN # Cost 9904 @ \$0.38 /Lb |
| | G. TIME & DATE OF H. DÉLIVERY TIME | Non-RCRA S | olids | ERG Gulde #Yr: / 08 |
| | AF FORM 2005, JUN 86 (EF-V1) (PB/FORM PRO) | PREVIOUS EDITION | WILL BE USED. | |
| | -'.' osc.4045 | er Production Shop Code R900IT | B INSPECTOR, NAME-STAMP, DATE (TIN) K. Emerson/256-2184 Container 9-652 | Pick-up Date: 0-Jan-00 Profile #: SN-09-42 Container 158 Weights in Lbs: |
| DOCUMENT | STOCK NUMBER UNIT OF QUANTI | 158 1 x 55 | ACT ORG SHOP 30 31 32 33 34 34 34 34 34 34 34 34 34 34 34 34 | 5 36 37 38 39 40 41 42 43 44 T 0-36526 9652 H |
| D. PART NUMBER/MFGR CODE OR NAME/REMARKS WORK ORDER TEX. CON FAO SHIP TO SHIP TO SHIP TO SHIP TO S1 S1 S1 S2 S3 TO REFERENCE/TECHNICAL PUBLICATION OR ASSEMBLY Absorbents c/w, POL, Ar REO DEL DT UJC MARK FOR SHIP TO S1 S1 S1 S4 S5 S6 S7 S8 S9 60 81 AT CC DC DOCUMENT NUMBER 8 T O REFERENCE/TECHNICAL PUBLICATION OR ASSEMBLY Absorbents c/w, POL, Ar MARK FOR SHIP TO S1 S1 S1 S4 S5 S6 S7 S8 S9 60 81 AT CC DC DOCUMENT NUMBER 8 T O REFERENCE/TECHNICAL PUBLICATION OR ASSEMBLY | | | | |
| ISSUE/ | WORK ORDER | UJC CC DC DOCUMENT N 65 66 67 68 69 70 7 | UMBER POST/POST | T.O. PSC AND/OR ERRC CLIN # Cost 9904 @ \$0.38 /Lb |
| | G. TIME & DATE OF H. DELIVERY TIME I. DELIVERY | Non-RCRA S | | ERG Guide #/Yr. / 08 |
| | AF FORM 2005, JUN 86 (EF-V1) (PerFORM PRO) | PREVIOUS EDITION | WILL BE USEO. | |
| | T I N Bidg. # 516 phone: 256-4245 REQUEST. TIME & DATE (ISU): 0-Jan-00 0900 | er Production Shop Code R900IT | K. Emerson/256-2184 Container 9-652 | Pick-up Date. 0-Jan-00 Profile #: SN-09-42 Convainer 158 Weights in Lbs. |
| OCUMENT | STOCK NUMBER UNIT OF QUANT 18 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 9999 SN-09-42 LB | | ACT ORG SHOP 30 31 32 33 34 3 | 5 36 37 38 39 40 41 42 43 44 |
| SSUE/TURN-IN DOCUMENT | Non-Hazardous Waste D. PART NUMBER/MFGR CODE OR NAME/REMARKS X | Absorbents c/v | PUBLICATION OR END-ITEM APPLICATION/NEXT HIG | 9HER |
| ISSUE | WORK ORDER TEX CON FAO SD PROJECT PRI REQ DEL DT SHIP TO 51 S1 S4 55 56 57 58 59 63 61 AT 62 63 64 TIME & DATE OF H. DELIVERY TIME | UUC CC DC DOCUMENT N 65 66 67 68 69 70 7 | UMBER POST/POST | T.O PSC AND/OR ERRC CLIN# Cost 9904 @ \$0.38 /Lb |
| | AF FORM 2005, JUN 86 (EF-V1) (ParFORM PRO) | Non-RCRA S | | ERG Guide #/Yr. / 08 |

A INCHECKER, NAME, DATE

Pick-up Date. 0-Jan-00

Open Hazardous Waste Container 126 MXS Corrosion Control Shop Bldg 5026 Satellite Accumulation Area



A view of the drum looking down into the overpack. Funnel is closed.

Hazardous Waste Container Label 932nd Structural Paint Shop Hazardous Waste—Barrier Paper



Picture 79 - Scott Inspection Report RCRA







Oil Release



Oil spot 22 Jul 09



Oil Spot 1 Nov 10

Coy, Mark E Civ USAF AMC 375 CES/CEAN

From:

Snyder, Robbin [RSnyder3@wm.com]

Sent: To: Tuesday, October 27, 2009 10:52 AM McCoy, Mark E Civ USAF AMC 375 CES/CEAN

Cc:

DHAFLEY@HTR-GROUP.COM

Subject:

RE: PICK-UP Order

Robbin Snyder

Logistics Manager

Waste Management LampTracker

PO BOX 185

Lake Ozark, MO 65049

PH. 888-537-4874

FX. 573-302-7579

EMAIL: rsnyder3@wm.com
WEB: www.wmlamptracker.com



From everyday collection to environmental protection, Think Green®, Think Waste Management.

From: Scott AFB [mailto:Mark.McCoy@scott.af.mil]

Sent: Tuesday, October 27, 2009 10:43 AM

To: onlineorders@htr-group.com

Subject: PICK-UP Order



Date: 10/27/2009 Submit Date: 27-Oct-2009 Submit Time 11:42:49

GENERATOR OF WASTE:

NAME: Scott AFB

ADDRESS: 702 Hangar Road

CITY, STATE, ZIP: Scott AFB, IL, 62225

CONTACT: Kevin Emerson

PHONE #: 618 256-2184 FAX #: 618 256-5934

RECYCLING PICK-UP ORDE

WM Salesman Name:

0

BILL TO:

NAME: 375 CES/CEAN Attn: Mr. Mark McCoy

ADDRESS: 702 Hangar Road

CITY, STATE, ZIP: Scott AFB, IL, 62225

CONTACT: 0

PHONE #: 0 FAX #: 618 256-5934

Submitters Name

I hereby authorize HTR to PICKUP the material listed for recycle in accordance with the price QUOTATION and TERMS and CONDITIONS of our contract/agreement.

| contract/agreement. | | | | |
|--|--------------------|----------|---|--|
| TYPE | UNIT OF MEASURE | QUANTITY | ORDER TRACKING SYSTEM | |
| 1 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | (for HTR office use) | |
| 2 FOOT FLUORESCENT LAMP/S RECYCLING | each | 398 | ORDER ACKNOWLEDGEMENT | |
| 3 FOOT FLUORESCENT LAMP/S RECYCLING | each | 57 | Date: [10/27/2009] BY: [robbin] | |
| 4 FOOT FLUORESCENT LAMP/S RECYCLING | each | 3,793 | Via: [email] | |
| 5 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | BILL OF LADING #[29014] | |
| 6 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | Approximate PICK-UP Date: [will contact] | |
| 7 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | PICK-UP Date: [] | |
| 8 FOOT FLUORESCENT LAMP/S RECYCLING | each | 45 | Invoice Date: [] | |
| UTUBE FLUORESCENT LAMP/S RECYCLING | each | 1025 | | |
| CIRCULAR FLUORESCENT LAMP/S RECYCLING | each | 0 | Approximate pick-up date is subject to change | |
| COMPACT FLUORESCENT LAMP/S RECYCLING | each | 0 | depending on scheduling, load times, weather, mechanical breakdowns, traffic delays, and oth | |
| HID MERCURY/HALIDE/SODIUM LAMP/S RECYCLING | each | 270 | conditions beyond HTR control. HTR dispatched driver will confirm pick-up date/time prior to arritruck. | |
| SHIELD/COATED/GROOVED LAMP/S RECYCLING | each | 0 | | |
| NCANDESCENT LAMP/S RECYCLING | each | 0 | | |
| UV/ARC/IGNITRON LAMP/S RECYCLING | each | 0 | | |
| BROKEN LAMP/S RECYCLING | lbs. | 0 | | |
| CRUSHED FLUORESCENT LAMP/S RECYCLING | lbs. | 0 | Special Instructions: Cell phone number for Kevin Emerson 618 567-2 | |
| PCB BALLAST RECYCLE/INCINERATION | lbs. | 0 | Complete inventory will be provided to the driver. | |
| NON-PCB BALLAST RECYCLE | lbs. | 0 | | |
| ESCRAP RECYCLING | lbs. | 0 | | |
| MERCURY DEVICE RECYCLING | lbs. | 0 | | |
| LEAD ACID BATTERY RECYCLING | lbs. | 0 | | |
| ALKALINE BATTERY RECYCLING | lbs. | 0 | | |
| NICKEL BATTERY RECYCLING | lbs. | 0 | | |
| LITHIUM BATTERY RECYCLING | lbs. | 0 | | |
| MISCELLANEOUS RECYCLING | | | 0 | |
| | | | | |

^{*}Quantities on PICK-UP ORDER subject to actual count by WMLT RECEIVING TECHNICIAN

Site Information: Hours 7:00 am - 4:00 pm M-F Loading Dock No

#: 0 **Kevin Emerson**

Submitters Name

I hereby authorize HTR to PICKUP the material listed for recycle in accordance with the price QUOTATION and TERMS and CONDITIONS of our contract/agreement.

| | TYPE | UNIT OF MEASURE | QUANTITY | ORDER TRACKING SYSTEM |
|---|--|--------------------|------------|---|
| | 1 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | (for HTR office use) |
| | 2 FOOT FLUORESCENT LAMP/S RECYCLING | each | 398 | ORDER ACKNOWLEDGEMENT |
| | 3 FOOT FLUORESCENT LAMP/S RECYCLING | each | 57 | Date: [10/27/2009] BY: [robbin] |
| • | 4 FOOT FLUORESCENT LAMP/S RECYCLING | each | 3,793 | Via: [email] |
| • | 5 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | BILL OF LADING # [29014] |
| | 6 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | Approximate PICK-UP Date: [will contact] |
| | 7 FOOT FLUORESCENT LAMP/S RECYCLING | each | 0 | PICK-UP Date: [] |
| | 8 FOOT FLUORESCENT LAMP/S RECYCLING | each | 45 | Invoice Date: [] |
| | UTUBE FLUORESCENT LAMP/S RECYCLING | each | 1025 | |
| | CIRCULAR FLUORESCENT LAMP/S RECYCLING | each | 0 | Approximate pick-up date is subject to change |
| | COMPACT FLUORESCENT LAMP/S RECYCLING | each | 0 | depending on scheduling, load times, weather, mechanical breakdowns, traffic delays, and other |
| | HID MERCURY/HALIDE/SODIUM LAMP/S RECYCLING | each | 270 | conditions beyond HTR control. HTR dispatcher driver will confirm pick-up date/time prior to arriva |
| | SHIELD/COATED/GROOVED LAMP/S RECYCLING | each | 0 | truck. |
| | INCANDESCENT LAMP/S RECYCLING | each | 0 | |
| | UV/ARC/IGNITRON LAMP/S RECYCLING | each | 0 | |
| | BROKEN LAMP/S RECYCLING | lbs. | 0 | 一个一个一个人的一个人的一个人的一个人的一个人的一个人的一个人的一个人的一个人的 |
| | CRUSHED FLUORESCENT LAMP/S RECYCLING | lbs. | 0 | Special Instructions: Cell phone number for Kevin Emerson 618 567-26 |
| | PCB BALLAST RECYCLE/INCINERATION | lbs. | 0 . | Complete inventory will be provided to the driver. |
| | NON-PCB BALLAST RECYCLE | lbs. | 0 | |
| | ESCRAP RECYCLING | lbs. | 0 | |
| | MERCURY DEVICE RECYCLING | lbs. | 0 | |
| | LEAD ACID BATTERY RECYCLING | lbs. | 0 | |
| | ALKALINE BATTERY RECYCLING | lbs. | 0 | |
| | NICKEL BATTERY RECYCLING | lbs. | 0 | |
| | LITHIUM BATTERY RECYCLING | lbs. | 0 | |
| | MISCELLANEOUS RECYCLING | | | 0 |

^{*}Quantities on PICK-UP ORDER subject to actual count by WMLT RECEIVING TECHNICIAN

Site Information: Hours 7:00 am - 4:00 pm M-F Loading Dock No

aste Management recycles enough paper every year to save 41 million trees. By not printing is email, you can help save even more.



Fw: Response to Scott AFB NOV

Susan Tennenbaum, Arturo Cisneros, Daniel Chachakis to:

Diane Sharrow

10/12/2010 09:00 AM

From:

Daniel Chachakis/R5/USEPA/US

To:

Susan Tennenbaum/R5/USEPA/US@EPA, Arturo Cisneros/R5/USEPA/US@EPA, Diane

Sharrow/R5/USEPA/US@EPA

Response from Scott AFB for evaluation.

Daniel F. Chachakis **Environmental Protection Specialist** U.S. EPA Region 5 312/886-9871

---- Forwarded by Daniel Chachakis/R5/USEPA/US on 10/12/2010 08:56 AM -----

From:

"Patterson, John W Civ USAF AMC 375 CES/CEAN" < John.Patterson@scott.af.mil>

To:

Daniel Chachakis/R5/USEPA/US@EPA

Date:

09/30/2010 10:10 AM

Subject:

Response to Scott AFB NOV

Mr. Chachakis, attached is an advance copy of the Scott AFB reply to the Notice of Violation (EPA ID No. IL7570024177. Original is being mailed today.

Very Respectfully,

JOHN W. PATTERSON Chief, Environmental Management 375 CES/CEAN, Scott AFB



(618) 256-2046 NOV Response Ltr.pdf



DEPARTMENT OF THE AIR FORCE HEADQUARTERS 375TH AIR MOBILITY WING (AMC)

30 Sep 10

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineer Squadron 701 Hangar Road Scott AFB IL 62225-5035

Daniel F. Chachakis Environmental Protection Agency, Region 5 77 West Jackson Boulevard, LR-8J Chicago IL 60604

Dear Mr Chachakis

Re: Notice of Violation (NOV), Scott Air Force Base, EPA IL No.: IL7570024177

Scott AFB is in receipt of the referenced NOV dated 16 Sep 10 for the Jul 09 multimedia inspection conducted by your office. Actions were taken immediately to address the deficiencies and concerns identified during your inspection out-brief back in Jul 09. Corrective actions for all violations cited in the notice have been completed with the exception of the deficiencies noted in our Storm Water Pollution Prevention Plan (SWPPP). A complete update of the SWPPP is currently in progress under contract with the planned completion in Mar 11.

A summary of the actions taken to correct each deficiency is provided.

RCRA

1. Hazardous Waste Characterization

- Bldg 5022: Container was not labeled correctly. Prior to 22 Jul 09, the 126 MXS Propulsion Shop maintained a waste stream for a parts washer which consisted of hazardous waste filters. This waste stream was de-activated during the spring of 2010, and the shop turned in the final container of this waste. Subsequently, a new drum was put in place to be used to collect floor sweeping compound. This drum should have been labeled as Non-Hazardous waste. At the time of the inspection, there were a couple absorbent pads which did not belong in this drum. Shop personnel have been briefed on the proper disposal of absorbent pads as well as the importance of ensuring only the actual waste intended for the specific drum be placed into the waste container. This item has been addressed and is now in compliance.
- Bldg 5006: Container was not labeled correctly. The 126 LRS Vehicle Maintenance shop inadvertently labeled this Hazardous Waste as a Non-Hazardous Waste. The shop personnel were notified of the error, and the proper label was affixed to the

drum. This waste stream was characterized in Mar 06 on waste profile sheet number GH-05-064.

- Waste Water Treatment Plant (WWTP) tray of unknown materials: The unknown materials were incorrectly stored under the pavilion at the WWTP. The day after the conclusion of the EPA inspection, all unknown materials were segregated and characterized as either solid waste or non-RCRA waste and properly disposed. Non-RCRA solid waste was manifested on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Container (Picture 51): The contents of the container were appropriately characterized, over packed, and properly disposed of on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Drum #2: The contents of the container were separated and appropriately characterized as solid waste and properly disposed of on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Drum #4: The contents of the container were appropriately characterized as solid waste and properly disposed of on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Drum 10: The contents of the container were appropriately characterized as non-RCRA waste and properly disposed of on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Fuel Filter Drum: The fuel filters were appropriately repacked at the 90-Day Central Accumulation Site (CAS) and properly disposed of on 11 Sep 09.
- WWTP Pails: The contents of the three containers (pails) were separated by their physical state, appropriately characterized, and disposed of on 8 Sep 09 on manifest number 005389733JJK.
- WWTP Container (picture 60): The contents of the container were evaluated, characterized as non-hazardous, and properly disposed.
- Vehicle Fleet Maintenance Bldg: The contents of the container, "Dirty Rags," were evaluated and characterized as non-RCRA and are now collected and disposed of as non-RCRA solids through the Individual Accumulation Point (IAP).
- 2. Open Hazardous Waste Container: The item depicted in the bottom picture on page 28 of the RCRA Inspection Report is actually a 30-gal drum inside an over pack that is used as secondary containment. The drum has a funnel which closes and latches which qualifies as a closed container. The base feels the over pack is a good additional safety precaution since there is a floor drain within a few feet of this container. Shop personnel have been briefed on the proper procedures to ensure the latches on the funnel are employed anytime the funnel is not in use.

- 3. Hazardous Waste Container Label: Procedures have been developed, but were not followed by the IAP site manager. Scott AFB conducts quarterly hazardous waste training for all satellite accumulation managers and alternates as well as offers individual training on an as needed basis in accordance with the Scott AFB Hazardous Waste Management Plan. The IAP site manager has been briefed on the proper procedures.
- 4. Oil Release: The oil release was cleaned up the day after it was discovered. Heavy Equipment personnel were briefed on the importance of cleaning up any spill as they occur.
- 5. Universal Waste: This incident was a combination of a lack of contractor education and proper oversight by the Scott AFB Project Manager. The fluorescent light bulb was removed from the light fixture at the time of discovery and placed at the 90-day Consolidated Accumulation Storage (CAS) site conex for Universal Waste Storage.

UST

- 1. Piping Leak Detection Bldg 1640: At the time of the inspection, Scott AFB was awaiting the permit from the State Fire Marshall to upgrade the software on the automatic line leak detectors to include the annual 0.1 gallon per hour leak rate test. The work was completed on 24 Sep 09 and a test conducted. The software is set up to automatically run the 0.1 gallon per hour rate test annually.
- 2. Piping Leak Detection Bldg 450: On 4 May 10 a certified tank installer inspected the automatic line leak detector system installed on the tanks at Bldg 450. The system is installed IAW manufacturer requirements. No alterations have been made to the system. An annual function test was completed for this year on 1 Jun 10.
- 3. Inoperative Spill and Overfill Prevention System Bldg 1575: A certified tank installer recalibrated the audible alarm on 29 Jul 09 and replaced the bulb on 27 Aug 09. System was tested and is operative. Testing of the alarm was included in the annual inspection of the leak detection systems in Jun 10.

CWA

- 1. Failure to Meet Zinc Limit: The cause of the zinc exceedance was the water supplied by Illinois American Water Company contained a zinc corrosion inhibitor at our request and other local municipalities. On 30 Nov 09 Illinois American Water changed the corrosion inhibitor to one not containing zinc. Zinc levels dropped to within permit limits.
- 2. Late Annual MS4 Reports: The 2008 annual report was mailed 13 Aug 09 and received by the Illinois EPA on 17 Aug 09. The base has improved the coordination process to obtain timely Wing Commander's signature and on time submittal of future reports.

3. Inadequate SWPPP: A contract was awarded 19 Aug 10 to update the SWPPP. A copy of your NOV letter and inspection report will be forwarded to the contractor to ensure all items identified as deficient are addressed in the updated plan. The draft plan is anticipated in Jan 11 with the finalized plan in Mar 11. We intend to have wing coordination complete and Wing Commander's approval no later than May 11.

I trust this response defines proper closure actions to all of your listed deficiencies. If you have any questions, please contact Mr John Patterson, 375 CES/CEAN, (618) 256-2046.

Sincerely

CRAIG P. JOHNSON, Lt Col, USAF

Commander

cc:

AFCEE/CCR-D AMC/A7A 375 CES/CEA



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30 Sep 10

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Sincerely

CRAIG P. JOHNSON, Lt Col, USAF

Commander

cc:

AFCEE/CCR-D AMC/A7A 375 CES/CEA



Land and Chemicals Division

| Type of Document: | Inspection Report w/ Checklist |
|-------------------|--------------------------------|
| Type of Document. | Hispection Kepult W/ Checklist |

Facility Name:

Scott Air Force Base

Facility Location:

702 Hanger road

Facility City:

Scott Air Force Base

Facility State:

Illinois

Facility ZIP Code:

62225

U.S. EPA ID Number:

IL7570024177

| Assigned Staff | | | |
|----------------|------------|--------|--------|
| Dan Chachakis | (LCD/RCRA) | Phone: | 6-9871 |
| | (ORC) | Phone: | NA |

| Name | Signature Signature | | <u>Date</u> | |
|------------------------|---------------------|--------------|-------------|--|
| Author | Daniel Chachakis | x () 17 (11) | 05/16/09 | |
| ORC Attorney | NA | x / | 7.7 | |
| ORC Section Chief | NA | X | | |
| Section Chief | Jorna Jereza | x | | |
| Branch Chief | NA | X | | |
| Division Director | NA | Х | | |
| Regional Administrator | NA | X | | |

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief/Division Director/Regional Administrator signs this sheet and original letter:

Date stamp the cover letter;

Make three copies of the contents of this folder:

- a. One copy for the assigned staff;
- b. One copy for the section file; and
- c. One copy for the official file.

Make any additional copies for cc's or bcc's

cc's:

bcc's:

Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file

E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

SEP 1 6 2010

REPLY TO THE ATTENTION OF: LR-8J

CERTIFIED MAIL 7009 1680 0000 7665 4937 RETURN RECEIPT REQUESTED

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineering Squadron 701 Hanger Road Scott Air Force Base, Illinois 62225-5035

> Re: Notice of Violation Scott Air Force Base EPA ID No.: IL7570024177

Dear Lieutenant Colonel Johnson:

On July 21 to July 23, 2009, representatives of the U. S. Environmental Protection Agency inspected Scott Air Force Base, a U.S. Air Force facility located in St Clair County, Illinois (Scott AFB or "the facility"). The purpose of the inspection was to evaluate Scott AFB's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) including those regulations related to Underground Storage Tanks (USTs) and those regulations related to the generation, treatment and storage of hazardous waste. The facility was also inspected to determine compliance with certain provisions of the Clean Water Act (CWA). Please find enclosed, a copy of the RCRA Compliance Evaluation Inspection Report dated October 28, 2009, and the Underground Storage Tank Inspection and Spill Prevention Containment and Countermeasures Review of Scott AFB for the time period of July 21 and 22, 2009, and the Compliance Evaluation Inspection Report dated August 11, 2009, for your reference.

RCRA

Based on information provided by Scott AFB's personnel, a review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that Scott AFB is engaged in storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, Scott AFB must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 C.F.R. § 262.34(a) and (c)]. We find that Scott AFB was not in compliance with the

following conditions for a hazardous waste storage permit exemption, and violated the following requirements:

- 1. A large quantity generator must determine whether its waste is hazardous. See, 35 IAC § 722.111 [40 C.F.R. § 262.11].
 - At the time of the inspection, Scott AFB had not made a determination for all of the waste stored in a container located in Building 5022. (See page 26 of the RCRA Compliance Evaluation Inspection Report, picture 29.)
 - At the time of the inspection Scott AFB had a non-hazardous waste label on a container
 of paint thinner rags stored in a conex near building 5006; when opened, a strong solvent
 smell was released from the container. (See page 32 of the RCRA Compliance Evaluation
 Inspection Report, picture 39.)
 - At the time of the inspection, a tray of unknown materials was stored within the fenced area of the Wastewater Treatment Plant area. (See page 38 of the RCRA Compliance Evaluation Inspection Report, picture 45.)
 - At the time of the inspection, a container without label or markings to describe the contents of the container was stored within the fenced area of the Wastewater Treatment Plant area. (See page 41 of the RCRA Compliance Evaluation Inspection Report, picture 51.)
 - At the time of the inspection, a container with the markings, "Drum #2," and "Everything" was stored within the fenced area of the Wastewater Treatment Plant area. (See page 42 of the RCRA Compliance Evaluation Inspection Report, picture 54.)
 - At the time of the inspection, a container with the markings, "Drum #4," and
 "Everything" was stored within the fenced area of the Wastewater Treatment Plant area.
 (See page 43 of the RCRA Compliance Evaluation Inspection Report, picture 55.)
 - At the time of the inspection, a container with the markings, "Drum 10", and "Everything" was stored within the fenced area of the Wastewater Treatment Plant area (see page 43 of the RCRA Compliance Evaluation Inspection Report, picture 56).
 - At the time of the inspection, a container with the markings, "Fuel Filter Drum," and
 "Salvage Drum" was stored within the fenced area of the Wastewater Treatment Plant
 area. (See page 44 of the RCRA Compliance Evaluation Inspection Report, pictures 57
 and 58.)
 - At the time of the inspection, three containers (pails) without label or markings to describe the contents of the containers were stored within the fenced area of the Wastewater Treatment Plant area. (See page 45 of the RCRA Compliance Evaluation Inspection Report, picture 59.)

- At the time of the inspection, a container without label or markings to describe the
 contents of the container was stored within the fenced area of the Wastewater Treatment
 Plant area. (See page 45 of the RCRA Compliance Evaluation Inspection Report, picture
 60.)
- At the time of the inspection, a container with the markings, "Dirty Rags," was stored within the Vehicle Fleet Maintenance Building. (See page 67 of the RCRA Compliance Evaluation Inspection Report, picture 91.)

In response to this violation, we request that Scott AFB, at a minimum, provide the following information:

- Whether the material in each container listed above is a hazardous waste or a solid waste.
- Whether the material in each container belonged in a container labeled with the words, "Hazardous Waste."
- The disposition of the material in each container.
- If any materials do not meet the criteria for hazardous waste but are stored in a container marked or labeled with the words, "Hazardous Waste," provide information on Scott AFB's procedures to prevent the addition of solid waste to hazardous waste storage containers.
- 2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A), 725.273(a) [40 C.F.R. §§ 262.34(c)(1)(i), 265.173(a)]. This also applies to owners and operators of hazardous waste storage facilities that use containers to store hazardous waste, under 35 IAC § 724.273(a) [40 C.F.R. § 264.173(a)].

At the time of the inspection, one 55-gallon container used to hold waste paint hazardous waste in the satellite accumulation area was open, and waste was not being added to or removed from the container. (See RCRA Compliance Evaluation Inspection Report, pages 28 – 29.) Scott AFB therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility container closure requirement.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always mark its containers with the words "hazardous waste" or other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 C.F.R. § 262.34(c)(1)(ii)].

At the time of the inspection, a container used to hold hazardous waste in the satellite accumulation area was not labeled with the words "hazardous waste" or other contentidentifying words. (See page 59 of the RCRA Compliance Evaluation Inspection Report,

picture 79.) Scott AFB therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption. In response to this violation, we request that Scott AFB provide, at a minimum, a statement as to how Scott AFB intends to ensure that containers at hazardous waste satellite locations are marked or labeled with the words, "Hazardous Waste" or other content-identifying words.

4. A generator of used oil, upon detection of a release of used oil to the environment, must clean up and manage properly the released used oil and other materials. See 35 IAC § 739.122(d) [40 C.F.R. § 279.22(d)].

At the time of the inspection, Scott AFB failed to clean up a release of used oil in the Heavy Equipment Area. (See page 51 of the RCRA Compliance Evaluation Inspection Report, page 68.)

5. A large quantity generator of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. See 35 IAC § 733.133(d) [40 C.F.R. § 273.33(d)].

At the time of the inspection, Scott AFB disposed of a single waste bulb in a scrap metal roll-off container, not in a structurally sound container adequate to prevent breakage. (See page 53 of the RCRA Compliance Evaluation Inspection Report, picture 71.)

At this time, EPA is not requiring Scott AFB to apply for a hazardous waste storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period.

UST

1. 40 C.F.R. Part 280, Subpart D, sets forth the release detection requirements for UST systems. The methods of release detection for piping must be conducted according to the following requirements according to 40 C.F.R. § 280.44: (a) Automatic line leak detectors. Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm may be used only if they detect leaks of 3 gallons per hour at 10 pounds per square inch line pressure within 1 hour. An annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements. (b) Line tightness testing. A periodic test of piping may be conducted only if it can detect a 0.1 gallon per hour leak rate at one and one-half times the operating pressure. (c) Applicable tank methods. Any of the methods in § 280.43 (e) through (h) may be used if they are designed to detect a release from any portion of the underground piping that routinely contains regulated substances.

At the time of the inspection, Scott AFB had failed to conduct leak detection for piping in accordance with 40 C.F.R. § 280.44(a)-(c) for the USTs located at building #1640.

2. Methods of release detection for piping: Each method of release detection for piping used to meet the requirements of § 280.41 must be conducted in accordance with the following: (a) Automatic line leak detectors. Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm may be used only if they detect leaks of 3 gallons per hour at 10 pounds per square inch line pressure within 1 hour. An annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements [See 40 CFR § 280.44].

At the time of the inspection, Scott AFB had failed to conduct release detection for the piping of the USTs located at building # 450 in violation of 40 CFR § 280.44(a).

3. 40 C.F.R. Subpart B sets forth the design, construction, installation, and notification requirements for UST systems. In order to prevent releases due to structural failure, corrosion, or spills and overfills for as long as the UST system is used to store regulated substances, all owners and operators of new UST systems must meet the requirements of 40 C.F.R. § 280.20(c).

At the time of the inspection, Scott AFB failed to use to use the required spill and overfill prevention system for the UST located at building #1575, in violation of 40 C.F.R. § 280.20(c).

EPA requires Scott AFB to address the UST violations noted above.

CWA

- 1. Scott AFB is a federal facility located in the State of Illinois. Federal facilities are subject to all federal, state, interstate and local requirements, administrative authority and process and sanctions respecting the abatement and control of water pollution in the same manner and to the same extent as any nongovernmental entity. CWA Section 313(a), 33 U.S.C. § 1323.
- 2. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants to waters of the United States except in compliance with certain sections of the CWA, including Section 402, 33 U.S.C. § 1342.
- 3. The State of Illinois, through its Environmental Protection Agency (IEPA), is approved under Section 402(b) of the CWA to administer the National Pollutant Discharge Elimination System (NPDES) program, including the issuance of storm water permits.
- 4. Scott AFB discharges storm waters to storm sewers which ultimately flow to Ash Creek which flows to Silver Creek in Springfield, Illinois. Silver Creek is a navigable waterway which is defined by Section 502(7) of the CWA, 33 U.S.C. § 1362(7) and "waters of the United States" as defined by EPA regulations in 40 C.F.R. § 122.2.

- 5. On March 16, 2005 IEPA issued to Scott AFB NPDES Permit NO. IL0026859 (NPDES Permit), effective August 1, 2005, for direct discharges to an unnamed tributary of Silver Creek from a Wastewater Treatment Plant and other sources. The NPDES Permit was amended March 29, 2007.
- 6. Scott AFB is covered under the Illinois General NPDES Permit for Discharges from Small Municipal Separate Storm Sewer Systems (the MS4 Permit) issued February 20, 2009 and effective April 1, 2009. Scott AFB also filed a Notice of Intent to be covered under the Illinois General NPDES Permit for Storm Water Discharges from Industrial Activities (the Industrial Storm Water Permit), reissued on April 3, 2009 as ILR002659 and effective May 1, 2009. Finally, Scott AFB submitted notices of intents for four ongoing construction projects for coverage under the Illinois General NPDES Permit for Storm Water Discharges from Construction Activities (the Construction Storm Water Permit) on September 2, 2008.
- 7. Under Section 308 of the CWA, 33 U.S.C. § 1318, EPA has the authority to conduct inspections and collect information.
- 8. Between July 21-23, 2009, an EPA representative contractor, Mr. Michael Prescott, an employee of Eastern Research Group, inspected Scott AFB. Mr. Prescott found that Scott AFB was not in compliance with the limits of its permits identified in paragraphs 5 and 6, above.
- 9. Scott AFB has failed to meet the .044mg/l zinc limit of its NPDES Permit since the effective date of that limit.
- 10. Scott AFB failed to timely submit the Annual Reports required by the MS4 Permit. Scott AFB submitted the 2007 report three months late and the 2008 report, due on June 1, had not been submitted at the time of the inspection.
- 11. Scott AFB's Industrial Storm Water Pollution Prevention Plan (SWPPP), required under its Industrial Storm Water Permit is out of date and contains the following deficiencies:
 - The SWPPP does not address numerous changes at the Base during the past five years and does not address the requirements in its latest MS4 Permit.
 - The SWPPP does not specify current personnel affiliated with the Storm Water Pollution Prevention Team, as required under E.6 of the Industrial Storm Water Permit.
 - The SWPPP failed to address erosion of the bank of Ash Creek that was caused by pumping storm water from pipes on the opposite bank of the Creek. In addition, the inspector noted accumulation of sediment. These issues were to be addressed under 6.e and f of the SWPPP.
 - Quarterly visual observations of discharges are not being conducted on a regular basis and are not being documented according to the requirements of E.8 of the SWPPP.

• Employee training has not been given to personnel at all levels of responsibility and in accordance with the requirements of E.6.g of the SWPPP.

At this time, EPA is requiring Scott AFB to respond to the RCRA, UST and CWA violations noted above, and to provide a schedule for compliance. You are hereby requested to submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. In the event that Scott AFB fails to adequately address the issues set forth in this letter, EPA will take further action as permitted by law.

You should submit your response to Daniel F. Chachakis, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois, 60604. If you have any questions regarding this letter, you may contact Mr. Chachakis at (312) 886-9871.

Sincerely,

Paul J. Little

Acting Chief, RCRA Branch Land and Chemicals Division

Tinka G. Hyde

Director

Water Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency John Patterson, 375th Civil Engineering Squadron



CORRECTED SAMPLE ANALYSIS DATA SHEETS



Mark E. McCoy, P.G.
Air Quality / Hazardous Waste Program Manager

Mark.McCoy@scott.af.mil

375 CES/CEAN

702 Hangar Road Building 56 Scott AFB, IL 62225-5035 Office - (618) 256-2167 Fax - (618) 256-5934 DSN - 576-XXXX





Land and Chemicals Division

| T CD | The section Deposit Checklist |
|--------------------|--|
| Type of Document: | ☐ Inspection Report/Checklist |
| | ☑ Notice of Violation Letter and Inspection Report/Checklist |
| | ☐ Letter of Acknowledgment |
| | ☐ Information Request |
| | ☐ Pre-Filing and Opportunity to Confer |
| | ☐ State Notification of Enforcement Action |
| | ☐ Return to Compliance |
| | ☐ Other Correspondence- NOD, memo to ORC |
| | |
| Facility Name: Sco | tt Air Force Base |
| C' C. ALED C | N. 4 TH |

City: Scott AFB State: Illinois

U.S. EPA ID#: <u>IL7570024177</u>

Assigned Staff: Daniel Chachakis

Phone: 6-9871

| Name | Signature | Date |
|------------------|------------------------|----------|
| Author | 744/11 | 08/09/10 |
| Regional Counsel | Susan Tennenburn R1425 | 8/9/10 |
| Section Chief | Jame M. Joseph | 8/17/10 |
| Branch Chief | RL Le | 8-23.10 |

Directions/Request for Clerical Support:

BPY 9/10

After the Section Chief and Branch Chief sign this sheet and NOV, return to staff. Water Division Director must sign prior to mailing.

Dual signature NOV: RCRA Branch and Water Division.

Pu 9/2/10

Swanson 568 9-3-1

THEWIEN TEAM 9/3/10

First-Class Mail Postage & Fees Paid USPS Permit No. G-10

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SEP 2 1 200

U S EPA 77 W JACKSON BLVD CHICAGO IL 60604 ATTN DAN CHACHAKIS

LAND AND CHEM (CALS) FINEAC U.S. EPA - (EGRONS) DE-9J

I.H.dhadadadadaladadadabbbbbbbbb



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

SEP 1 () 2010 <u>CERTIFIED MAIL 7009 1680 0000 7665 4937</u> <u>RETURN RECEIPT REQUESTED</u>

Lieutenant Colonel Craig P. Johnson Commander, 375th Civil Engineering Squadron 701 Hanger Road Scott Air Force Base, Illinois 62225-5035

Re: Notice of Violation Scott Air Force Base

EPA ID No.: IL7570024177

Dear Lieutenant Colonel Johnson:

On July 21 to July 23, 2009, representatives of the U. S. Environmental Protection Agency inspected Scott Air Force Base, a U.S. Air Force facility located in St Clair County, Illinois (Scott AFB or "the facility"). The purpose of the inspection was to evaluate Scott AFB's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) including those regulations related to Underground Storage Tanks (USTs) and those regulations related to the generation, treatment and storage of hazardous waste. The facility was also inspected to determine compliance with certain provisions of the Clean Water Act (CWA). Please find enclosed, a copy of the RCRA Compliance Evaluation Inspection Report dated October 28, 2009, and the Underground Storage Tank Inspection and Spill Prevention Containment and Countermeasures Review of Scott AFB for the time period of July 21 and 22, 2009, and the Compliance Evaluation Inspection Report dated August 11, 2009, for your reference.

RCRA

Based on information provided by Scott AFB's personnel, a review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that Scott AFB is engaged in storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, Scott AFB must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 C.F.R. § 262.34(a) and (c)]. We find that Scott AFB was not in compliance with the

following conditions for a hazardous waste storage permit exemption, and violated the following requirements:

- 1. A large quantity generator must determine whether its waste is hazardous. See, 35 IAC § 722.111 [40 C.F.R. § 262.11].
 - At the time of the inspection, Scott AFB had not made a determination for all of the waste stored in a container located in Building 5022. (See page 26 of the RCRA Compliance Evaluation Inspection Report, picture 29.)
 - At the time of the inspection Scott AFB had a non-hazardous waste label on a container
 of paint thinner rags stored in a conex near building 5006; when opened, a strong solvent
 smell was released from the container. (See page 32 of the RCRA Compliance Evaluation
 Inspection Report, picture 39.)
 - At the time of the inspection, a tray of unknown materials was stored within the fenced area of the Wastewater Treatment Plant area. (See page 38 of the RCRA Compliance Evaluation Inspection Report, picture 45.)
 - At the time of the inspection, a container without label or markings to describe the
 contents of the container was stored within the fenced area of the Wastewater Treatment
 Plant area. (See page 41 of the RCRA Compliance Evaluation Inspection Report, picture
 51.)
 - At the time of the inspection, a container with the markings, "Drum #2," and "Everything" was stored within the fenced area of the Wastewater Treatment Plant area. (See page 42 of the RCRA Compliance Evaluation Inspection Report, picture 54.)
 - At the time of the inspection, a container with the markings, "Drum #4," and "Everything" was stored within the fenced area of the Wastewater Treatment Plant area. (See page 43 of the RCRA Compliance Evaluation Inspection Report, picture 55.)
 - At the time of the inspection, a container with the markings, "Drum 10", and "Everything" was stored within the fenced area of the Wastewater Treatment Plant area (see page 43 of the RCRA Compliance Evaluation Inspection Report, picture 56).
 - At the time of the inspection, a container with the markings, "Fuel Filter Drum," and "Salvage Drum" was stored within the fenced area of the Wastewater Treatment Plant area. (See page 44 of the RCRA Compliance Evaluation Inspection Report, pictures 57 and 58.)
 - At the time of the inspection, three containers (pails) without label or markings to describe the contents of the containers were stored within the fenced area of the Wastewater Treatment Plant area. (See page 45 of the RCRA Compliance Evaluation Inspection Report, picture 59.)

- At the time of the inspection, a container without label or markings to describe the contents of the container was stored within the fenced area of the Wastewater Treatment Plant area. (See page 45 of the RCRA Compliance Evaluation Inspection Report, picture 60.)
- At the time of the inspection, a container with the markings, "Dirty Rags," was stored within the Vehicle Fleet Maintenance Building. (See page 67 of the RCRA Compliance Evaluation Inspection Report, picture 91.)

In response to this violation, we request that Scott AFB, at a minimum, provide the following information:

- Whether the material in each container listed above is a hazardous waste or a solid waste.
- Whether the material in each container belonged in a container labeled with the words, "Hazardous Waste."
- The disposition of the material in each container.
- If any materials do not meet the criteria for hazardous waste but are stored in a container marked or labeled with the words, "Hazardous Waste," provide information on Scott AFB's procedures to prevent the addition of solid waste to hazardous waste storage containers.
- 2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A), 725.273(a) [40 C.F.R. §§ 262.34(c)(1)(i), 265.173(a)]. This also applies to owners and operators of hazardous waste storage facilities that use containers to store hazardous waste, under 35 IAC § 724.273(a) [40 C.F.R. § 264.173(a)].

At the time of the inspection, one 55-gallon container used to hold waste paint hazardous waste in the satellite accumulation area was open, and waste was not being added to or removed from the container. (See RCRA Compliance Evaluation Inspection Report, pages 28 – 29.) Scott AFB therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility container closure requirement.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always mark its containers with the words "hazardous waste" or other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 C.F.R. § 262.34(c)(1)(ii)].

At the time of the inspection, a container used to hold hazardous waste in the satellite accumulation area was not labeled with the words "hazardous waste" or other content-identifying words. (See page 59 of the RCRA Compliance Evaluation Inspection Report,

picture 79.) Scott AFB therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption. In response to this violation, we request that Scott AFB provide, at a minimum, a statement as to how Scott AFB intends to ensure that containers at hazardous waste satellite locations are marked or labeled with the words, "Hazardous Waste" or other content-identifying words.

4. A generator of used oil, upon detection of a release of used oil to the environment, must clean up and manage properly the released used oil and other materials. See 35 IAC § 739.122(d) [40 C.F.R. § 279.22(d)].

At the time of the inspection, Scott AFB failed to clean up a release of used oil in the Heavy Equipment Area. (See page 51 of the RCRA Compliance Evaluation Inspection Report, page 68.)

5. A large quantity generator of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. See 35 IAC § 733.133(d) [40 C.F.R. § 273.33(d)].

At the time of the inspection, Scott AFB disposed of a single waste bulb in a scrap metal roll-off container, not in a structurally sound container adequate to prevent breakage. (See page 53 of the RCRA Compliance Evaluation Inspection Report, picture 71.)

At this time, EPA is not requiring Scott AFB to apply for a hazardous waste storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period.

<u>UST</u>

1. 40 C.F.R. Part 280, Subpart D, sets forth the release detection requirements for UST systems. The methods of release detection for piping must be conducted according to the following requirements according to 40 C.F.R. § 280.44: (a) Automatic line leak detectors. Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm may be used only if they detect leaks of 3 gallons per hour at 10 pounds per square inch line pressure within 1 hour. An annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements. (b) Line tightness testing. A periodic test of piping may be conducted only if it can detect a 0.1 gallon per hour leak rate at one and one-half times the operating pressure. (c) Applicable tank methods. Any of the methods in § 280.43 (e) through (h) may be used if they are designed to detect a release from any portion of the underground piping that routinely contains regulated substances.

At the time of the inspection, Scott AFB had failed to conduct leak detection for piping in accordance with 40 C.F.R. § 280.44(a)-(c) for the USTs located at building #1640.

2. Methods of release detection for piping: Each method of release detection for piping used to meet the requirements of § 280.41 must be conducted in accordance with the following: (a) Automatic line leak detectors. Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of regulated substances through piping or triggering an audible or visual alarm may be used only if they detect leaks of 3 gallons per hour at 10 pounds per square inch line pressure within 1 hour. An annual test of the operation of the leak detector must be conducted in accordance with the manufacturer's requirements [See 40 CFR § 280.44].

At the time of the inspection, Scott AFB had failed to conduct release detection for the piping of the USTs located at building # 450 in violation of 40 CFR § 280.44(a).

3. 40 C.F.R. Subpart B sets forth the design, construction, installation, and notification requirements for UST systems. In order to prevent releases due to structural failure, corrosion, or spills and overfills for as long as the UST system is used to store regulated substances, all owners and operators of new UST systems must meet the requirements of 40 C.F.R. § 280.20(c).

At the time of the inspection, Scott AFB failed to use to use the required spill and overfill prevention system for the UST located at building #1575, in violation of 40 C.F.R. § 280.20(c).

EPA requires Scott AFB to address the UST violations noted above.

CWA

- 1. Scott AFB is a federal facility located in the State of Illinois. Federal facilities are subject to all federal, state, interstate and local requirements, administrative authority and process and sanctions respecting the abatement and control of water pollution in the same manner and to the same extent as any nongovernmental entity. CWA Section 313(a), 33 U.S.C. § 1323.
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- 3. The State of Illinois, through its Environmental Protection Agency (IEPA), is approved under Section 402(b) of the CWA to administer the National Pollutant Discharge Elimination System (NPDES) program, including the issuance of storm water permits.
- 4. Scott AFB discharges storm waters to storm sewers which ultimately flow to Ash Creek which flows to Silver Creek in Springfield, Illinois. Silver Creek is a navigable waterway which is defined by Section 502(7) of the CWA, 33 U.S.C. § 1362(7) and "waters of the United States" as defined by EPA regulations in 40 C.F.R. § 122.2.

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- 8. Between July 21-23, 2009, an EPA representative contractor, Mr. Michael Prescott, an employee of Eastern Research Group, inspected Scott AFB. Mr. Prescott found that Scott AFB was not in compliance with the limits of its permits identified in paragraphs 5 and 6, above.
- 9. Scott AFB has failed to meet the .044mg/l zinc limit of its NPDES Permit since the effective date of that limit.
- 10. Scott AFB failed to timely submit the Annual Reports required by the MS4 Permit. Scott AFB submitted the 2007 report three months late and the 2008 report, due on June 1, had not been submitted at the time of the inspection.
- 11. Scott AFB's Industrial Storm Water Pollution Prevention Plan (SWPPP), required under its Industrial Storm Water Permit is out of date and contains the following deficiencies:
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 - The SWPPP does not specify current personnel affiliated with the Storm Water Pollution Prevention Team, as required under E.6 of the Industrial Storm Water Permit.
 - The SWPPP failed to address erosion of the bank of Ash Creek that was caused by pumping storm water from pipes on the opposite bank of the Creek. In addition, the inspector noted accumulation of sediment. These issues were to be addressed under 6.e and f of the SWPPP.
 - Quarterly visual observations of discharges are not being conducted on a regular basis and are not being documented according to the requirements of E.8 of the SWPPP.

• Employee training has not been given to personnel at all levels of responsibility and in accordance with the requirements of E.6.g of the SWPPP.

At this time, EPA is requiring Scott AFB to respond to the RCRA, UST and CWA violations noted above, and to provide a schedule for compliance. You are hereby requested to submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. In the event that Scott AFB fails to adequately address the issues set forth in this letter, EPA will take further action as permitted by law.

You should submit your response to Daniel F. Chachakis, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois, 60604. If you have any questions regarding this letter, you may contact Mr. Chachakis at (312) 886-9871.

Sincerely,

Paul J. Little

Acting Chief, RCRA Branch Land and Chemicals Division 🖌 Tinka G. Hyde

Director

Water Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency John Patterson, 375th Civil Engineering Squadron

cc's address:

John Patterson
Environmental Coordinator
375th Civil Engineering Squadron
702 Hanger Road
Scott Sir Force Base, Illinois 62225-5035

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5, LCD, RCRA Branch, LR-8J 77 W. JACKSON BLVD. CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

| SITE NAME: | Scott Air Force Base |
|---------------------|--|
| EPA ID NUMBER: | IL7570024177 |
| ADDRESS: | 702 Hanger Road Scott Air Force Base Illinois 62225 |
| DATE OF INSPECTION: | July 21 to 23, 2009 |
| EPA INSPECTOR: | Daniel F. Chachakis Environmental Protection Specialist (EPS) |
| | niel F. Chachakis, EPS mpliance Section 1 |
| | rna M. Jereza, Chief mpliance Section 1 |

Purpose of Inspection

This inspection was part of a multimedia evaluation of Scott Air force Base's (Scott AFB) compliance with various environmental regulations. This multimedia inspection was led by EPA. This inspection report documents the RCRA Compliance Evaluation Inspection (CEI) portion of the multimedia inspection. This report deals specifically with hazardous waste regulations found at Illinois Title 35 (35 IAC) and the Code of Federal Regulations (CFR).

Participants

Inspectors:

Daniel F. Chachakis EPA RCRA Inspector (Lead Multimedia Inspector)

Arturo Cisneros EPA Storage Tanks Inspector Michael Prescot EPA Contractor, Water Inspector

Wayne Caughman IEPA Water Inspector

Site Representatives:

Kevin Emerson Scott AFB, MACTEC contractor

Mark McCoy Air Quality / Hazardous Waste Program Manager

Introduction

I provided telephonic notification to the facility of the multimedia inspection on July 17, 2009, four days prior to the start of the multimedia inspection. I left notification with John Paterson, Chief, Environmental Flight; Mark McCoy, civilian contact for waste management; and Major Doug Freeman, executive officer at the Wing Headquarters. I confirmed notification with Mark McCoy, Air Quality / Hazardous Waste Program Manager, by end-of-day on July 17, 2009.

The inspectors arrived at the site at approximately 8:00 AM. We were escorted through security and taken to a conference room. We introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. Twenty facility representatives attended the opening conference. The sign in roster is attached (Attachment A). The opening conference occurred in the large conference room in Building 56.

During the opening conference, we discussed safety requirements, classified area access and document requirements. Scott AFB participants did not raise any classified area or document issues during the opening conference. Safety requirements varied per area, but included at a minimum, steel toed shoes, hard hat, ear protection, long sleeves and pants, and eye protection.

Mr. McCoy provided me with a verbal description of the site. Mr. McCoy led the tour, and provided me with the records I requested for review.

I provided the Small Business Resources information sheet to Mr. McCoy; phone (618) 256-2167.

Site Description

The following general information on the facility was taken from the Scott AFB's website - www.scott.af.mil:

The 375th Airlift Wing (AW) makes possible the command and control of the United States' entire military transportation effort. As the host unit, the 375th AW supports four major headquarters and a numbered air force with worldwide responsibilities: U.S. Transportation Command, Air Mobility Command, the Surface Deployment Distribution Command, Defense Information Technology Systems Agency and the 18th Air Force. It also provides support for the Air Force Communications Agency, the Defense Information Technology Contracting Office, the 932nd Airlift Wing (Reserve) and the Illinois Air National Guard's 126th Air Refueling. Scott AFB maintains an airport with an 8,000-foot runway, an Air Traffic Control Tower (built in 1997), and 22 home-based aircraft.

- C-9A Nightingale (3 total)
 - -- The C-9A is a modified version of Boeing DC-9, and is the only aircraft in the Air Force inventory specifically designed for movement of litter and ambulatory patients.
 - -- Flown and maintained by the 932nd Airlift Wing and can carry 40 litter patients or 40 ambulatory and four litter patients, or combinations of those
 - -- Maneuvers a hydraulically-operated folding ramp, a separate ventilation system for patients requiring isolation and medical refrigerator
- C-21A (12 total)
 - -- The C-21A is the military version of the Learjet 35A business jet
 - -- Wing owns all US-based C-21s, 50 total aircraft, operating out of 6 locations throughout the US
 - -- Mission provides cargo and passenger airlift; carries 8 passengers and 42 cubic feet of cargo space
- KC-135E (11 total) The KC-135E is a modified Boeing 707
 - -- The mission is to provide air refueling to virtually all Air Force, Navy and Marine Corp aircraft
 - -- Flown and maintained by the 126th Air National Guard
 - -- Max offload is 200,000 lbs. of fuel.

Besides family housing, there are 963 buildings, comprising more than 7 million square feet of space. Of those buildings, 37 are on the National Registry of Historic Places.

Scott AFB has roughly 5,800 active duty military and 2,000 Air National Guard and Air Force Reserve members, as well as approximately 8,314 family members assigned. The base also employs more than 3,100 Federal civilian employees and more than 2,400 non-appropriated fund

contract civilians and private business employees. There are an estimated 17,000 retired military members in the local area.

Scott AFB has about 1,400 family housing units.

Scott AFB is situated on approximately 2,560 acres. The base also has easement/right of way to another 1,029 acres

According to the OTIS data for Scott AFB, the facility has four Clean Air Act (CAA) Permits, three Clean Water Act (CWA) Permits, is a Treatment, Storage or Disposal (TSDF) facility and a large quantity generator (LQG) for RCRA, and submitted Toxic Release Inventory (TRI) reports up until 2005 for chlorine and ethylene glycol. The last CAA inspection was on 9/25/08 and no enforcement actions were noted in the OTIS record for the past 5 years. The last CWA inspection was on 4/15/08 for the Major NPDES Permit; the last inspection for the second CWA Permit was on 1/28/03; and Scott AFB has never been inspected for the third Permit. The facility was in noncompliance with one of the CWA Permits for eight of the last nine quarters, but no enforcement actions were noted in the OTIS record for the past five years. The last RCRA inspection was on 8/19/08 and the last RCRA enforcement action was an NOV on 6/15/04.

In addition, Lee Regner, EPA Federal Facilities Manager, reported there was a hospital at the facility that would likely have laboratories identified as one of the Federal Facility Evaluation Objectives (FFEO)'s integrated strategies. FFEO also identified a large amount of construction planned for the facility which would require a storm water construction permit. Storm water is another of the FFEO's integrated strategies and consequently, compliance with construction storm water permit requirements will also be evaluated.

Site Tour: DAY 1

The EPA inspectors toured the site observing their stated areas. As the RCRA inspector, I inspected satellite accumulation areas; the less than 90-day accumulation container storage area; solid waste storage areas, used oil storage areas, universal waste storage areas, and emergency equipment. I took photographs of the various waste operations and waste storage/accumulation areas during the inspection. I was escorted by Kevin Emerson and Mark McCoy.

According to Mr. McCoy, waste includes absorbents, oils, fuels, paints, lamps, batteries, pesticides, and medical wastes; and he indicated that there are no metal plating operations.

According to Mr. McCoy, there is approximately 50 satellite accumulation points located throughout the base, with single or multiple containers. However, there is only one less-than 90-day hazardous waste storage area known as the Centralized Accumulation Site (CAS).

Mr. McCoy confirmed that Scott AFB is not a TSDF; therefore, the OTIS database must be corrected to reflect this fact.

Mr. McCoy stated that all tenants generate hazardous waste under one identification number, and that all waste is managed by the 375th Airlift Wing (375th AW) under the 375th AW's authority as host tenant. Mr. McCoy stated that the chain of command runs from the 375th AW to the Civil Engineering Squadron to the Asset Management Branch.

Building 3306 Centralized Accumulation Site

Mr. McCoy stated that this building contains ten bays, each with a specific waste stream; Bay 8 contains reactive wastes, Bay 10 contains ignitable wastes, Bay 5 contains corrosive wastes, and Bay 6 contains toxic wastes.

I observed an eyewash station. I reviewed Daily Inspection Records for the Centralized Accumulation Site (CAS) from January 3, 2006 to July 21, 2009; I did not note any deficiencies in the inspection logs.

I observed, and took a picture of the eyewash station (Picture 1); included in Picture 1 is the CAS Daily inspection Log (item 1), the Eyewash Station Inspection Log (item 2), Instructions for Waste Shipment (item 3), the Evacuation Plan for the CAS (item 4), and a fire alarm pull station (item 5).



Picture 1:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

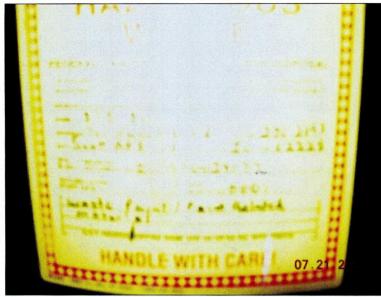
Eyewash Station

4) Location:

CAS

I observed that there was a phone in the CAS office. I observed that there were two fire extinguishers in the CAS storage area. I observed that there were three fire alarm pull stations within the CAS building.

I observed that there was a waste aerosol can collection container. I observed that this container was in the hazardous waste accumulation log, and that this container was a satellite containers. I took a picture of the label on this container (Picture 2). Note Picture 2 is not in focus. I took a picture of this area (Picture 3).



Picture 2:

1) Photographer:

Daniel Chachakis

2) Date:

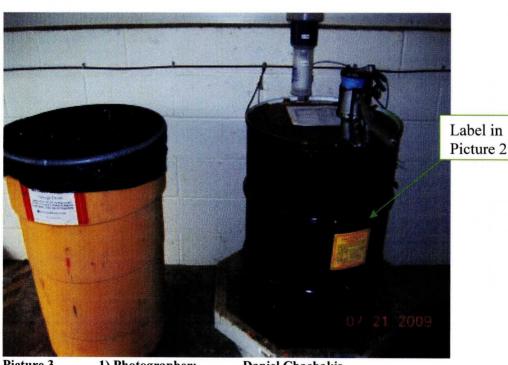
07/21/2009

3) Description:

Label, waste aerosol-can collection

4) Location:

CAS



Picture 3

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Waste aerosol-can collection area

4) Location:

CAS

I reviewed the waste profile sheet for waste paint. I reviewed a weekly inspection log.

I observed five spill kits within the CAS area.

I observed, and took a picture of the containers in Bay10.



Picture 4:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Containers in Bay 10

4) Location:

CAS

I recorded the following information from the labels on the containers in Picture 4:

Container 1: "Hazardous waste" label "26 May 09."

Container 2: "Hazardous waste" label "26 May 09." Container 3: "Hazardous waste" label "03 Jun 09."

Container 4: "Hazardous waste" label "20 Jul 09."

I observed that Bay 9 was empty. I observed that Bay 8 held a container with a universal waste label. I took a picture of the container in Bay 8 (Picture 5).



Picture 5:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Universal waste container, Bay 8

4) Location:

CAS

I observed that the label in Picture 5 was marked with the words, "Batteries."

I observed, and took a picture of containers in Bay 7 (Picture 6).



Picture 6:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Containers in Bay 7

4) Location:

CAS

I recorded the following information from the labels on the containers in Picture 6:

| 1. "Non-hazardous waste" label | "cleaners" | "03 Jun 08" |
|--------------------------------|------------------------|--------------|
| 2. "Non-hazardous waste" label | "adhesives peach glue" | "13 Jun 008" |
| 3. "Non-hazardous waste" label | "adhesives peach glue" | "13 Jun 008" |
| 4. "Non-hazardous waste" label | "latex paint" | "13 Jun 08" |
| 5. "Non-hazardous waste" label | "latex paint" | "13 Jun 08" |
| 6. "Non-hazardous waste" label | "latex paint" | "13 Jun 08" |
| 7. "Non-hazardous waste" label | "latex paint" | "13 Jun 08" |
| 8. "Non-hazardous waste" label | "latex paint" | "13 Jun 08" |

I observed, and took a picture of containers in Bay 6 (Picture 7).



Picture 7:

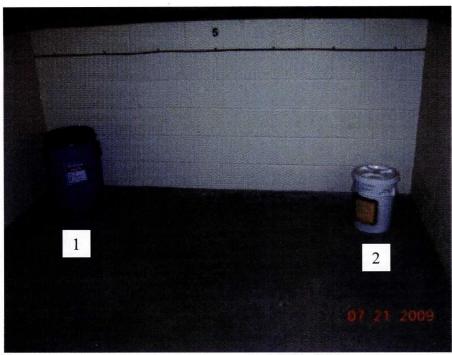
- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/2009
- 3) Description:
- Containers in Bay 6
- 4) Location:
- CAS

I recorded the following information from the labels on the containers in Picture 7:

- 1. "Hazardous Waste" label, "Warfarin Containers", "26 Jun 09", "D001"
- 2. "Hazardous Waste" label, "Waste Freon 113", "28 Apr 09", "F002"
- 3. "Hazardous Waste" label, "Waste Barrier Paper", "27 May 09", "D005, D006, D007, D010"
- 4. "Hazardous Waste" label, "Waste Barrier Paper", "27 May 09", "D005, D006, D007, D010"
- 5. "Hazardous Waste" label, "Paint Booth Filters", "18 Jun 09", "D007"
- 6. "Hazardous Waste" label, "Spent Plastic Media", "18 Jun 09", "D007"
- 7. "Hazardous Waste" label, "Spent Plastic Media", "8 Jul 09", "D007"

Mr. Emerson stated there were two sheet metal shops on base.

I observed, and took a picture of two containers in Bay 5 (Picture 8).



Picture 8:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Containers in Bay 5

4) Location:

CAS

I recorded the following information from the labels on the containers in Picture 8:

1. "Universal Waste" label "Batteries (lead acid)"

2. "Hazardous Waste" label "Acetic Acid Glacial"

"20 Jul 09"

"D001, D002"

I observed four containers in Bay 4 (Diagram 1).

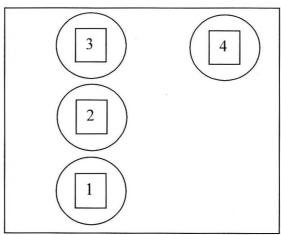


Diagram 1

I recorded the following information from the containers shown in Diagram 1:

| 1. "Non-hazardous Waste" label | "Used oil filters" | "07 Jul 09" |
|--------------------------------|--------------------|-------------|
| 2. "Non-hazardous Waste" label | "Antifreeze" | "07 Jul 09 |
| 3. "Non-hazardous Waste" label | "Fuel filters" | "17 Jun 09" |
| 4. "Non-hazardous Waste" label | "Absorbents" | "25 Jun 09" |

I observed, and took a picture of, eight containers in Bay 3 (Picture 9).



Picture 9:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/2009

3) Description:

Containers in Bay 3

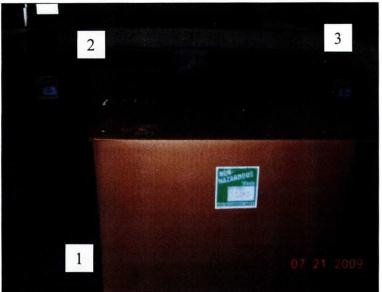
4) Location:

CAS

I recorded the following information from the labels on the containers in Picture 9:

| 1. "Non-hazardous Waste" label | "Absorbents w/oil" | "10 Jun 09" |
|--------------------------------|--------------------|-------------|
| 2. "Non-hazardous Waste" label | "Latex paint" | "02 Apr 09" |
| 3. "Non-hazardous Waste" label | "Latex paint" | "29 Jan 09" |
| 4. "Non-hazardous Waste" label | "Adhesives" | "29 Jun 09" |
| 5. "Non-hazardous Waste" label | "Adhesives" | "07 Apr 08" |
| 6. "Non-hazardous Waste" label | "Cleaners" | "03 Jun 09" |
| 7. "Non-hazardous Waste" label | "Used Antifreeze" | "25 Nov 08" |
| 8. "Non-hazardous Waste" label | "Used Antifreeze" | "25 Nov 08" |

I observed, and took a picture of three containers in Bay 2 (Picture 10).



Picture 10

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/2009
- 3) Description:
- Containers in Bay 2
- 4) Location:
- **CAS**

I recorded the following information from the labels on the containers in Picture 10:

1. "Non-hazardous Waste" label"Canisters C2"30 Apr 092. "Non-hazardous Waste" label"Canisters C2"30 Apr 093. "Non-hazardous Waste" label"Canisters C2"30 Apr 09

I observed that the three boxes in Picture 10 were taped shut.

I observed two containers in Bay 1 (Diagram 2).

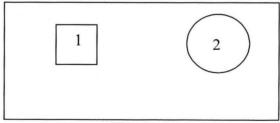


Diagram 2

I recorded the following information from the containers shown in Diagram 2:

- 1. "Non-hazardous Waste" label
- "Used oil"
- "26 Jun 09"

- 2. "Non-hazardous Waste" label
- "Sealant (AC240)"
- "07 Jul 09

There is no picture 11.

Used Lamp Storage Container

I observed, and took pictures of the outside and inside of a universal waste lamp storage conex (Pictures 12 and 13).



Picture 12

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Universal Waste Storage Conex

4) Location:

CAS



Picture 13:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Used bulb containers

4) Location:

Universal Waste Storage Conex

I observed and took a picture of used equipment located outdoors (Picture 14).



Picture 14:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Outdoor Storage

4) Location:

CAS

Mr. Emerson stated that the waste stream and profile information are in an automated data system. Mr. Emerson stated that he does not manage wastewater treatment sludge at the CAS location.

Mr. Emerson provided a copy of the current CAS site inventory for my review.

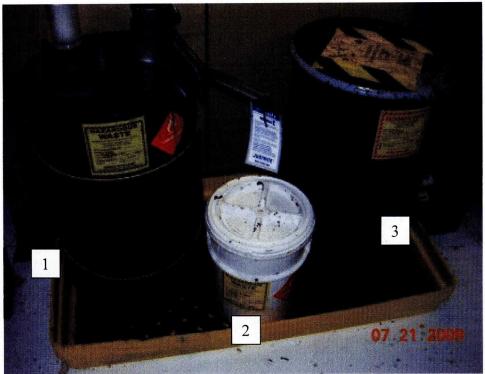
I reviewed training records located at the CAS site in the worker office. I observed job titles, job descriptions, training requirements, and other records in a binder at the CAS site. Kevin Emersion's training records are located in Building 3306.

Mr. Emerson provided me with a copy of the training dates for my review.

Building 5780: 126th Air Refueling Wing

We met with Technical Sergeant (TSGT) Mike Thorn. TSGT Thorn provided additional escort in this area.

I observed, and took a picture of a hazardous waste satellite accumulation area with three containers.



Picture 15:

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5780

I attempted to move the containers or looked inside the containers I could open, and recorded the following information from the containers as shown in Picture 15:

| 1. "Hazardous Waste" label | "Aerosol Waste" | "D001" | Not full |
|----------------------------|---------------------------|----------------|---------------|
| 2. "Hazardous Waste" label | "Polythioether Polymer" | "D001/D035" | Not full |
| 3. "Hazardous Waste" label | "Spent Sealants and Other | Solids" "D001" | approximately |
| | | | 90% full |

TSGT Thorn stated that dirty rags from this area are recycled, and that there is no profile for the rags.

Mr. Thorn stated that his workers conduct weekly hazardous waste satellite container inspections, and that his workers record the results of the inspection in writing.

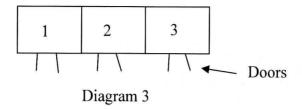
TSGT Thorn stated that there are five spill kits on-site; there are fire alarm pull boxes available; and there are emergency eyewash stations available.

TSGT Thorn stated that used adsorbent waste is generated at the site; this used adsorbent has a non-hazardous waste profile.

Building 5022, Hazardous Waste Satellite Accumulation Point

I observed, and took pictures of containers in a conex hazardous waste satellite accumulation point (Pictures 16, 17, 18 and 19.

I diagramed the conex (Diagram 3).



In Area 1 of the conex, I observed that there were two boxes of engine oil in this area. I observed, and took pictures of, four containers of used oil in this area (Pictures 17 and 16), and recorded information from the labels on these containers.



Picture 17

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022 conex

I opened the lid on container 2 in picture 17; I observed and took a picture of, the material in the container (Picture 16).



Picture 16

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/09
- 3) Description:
- Satellite Accumulation Area
- 4) Location:
- **Building 5022 conex**

I recorded the following information from the labels or markings on the containers designated 1 through 4 in Picture 17, Area 1:

- 1. "Non-hazardous Waste" label
- "Hydraulic Oil"
- "Used Oil"

- 2. "Non-hazardous Waste" label
- "Oil"
- "Used Oil"
- 3. "Drain Cans for Recycling Only (Scrap Metal)"
- 4. "Non-hazardous Waste" label
- "Used Oil Absorbents"

In Area 2 of the conex I observed, diagramed (Diagram 4), and took a picture of three containers behind a tote (Picture 18).

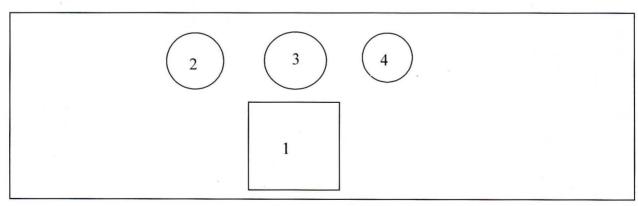


Diagram 4



1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022 conex

I recorded the following information from the containers as designated 1 through 4 in Picture 18:

- 1. "Used Oil Only" marking
- 2. "Storage" marking
- 3. "Hazardous Waste" label

"Fuel, JP-8"

"D001"

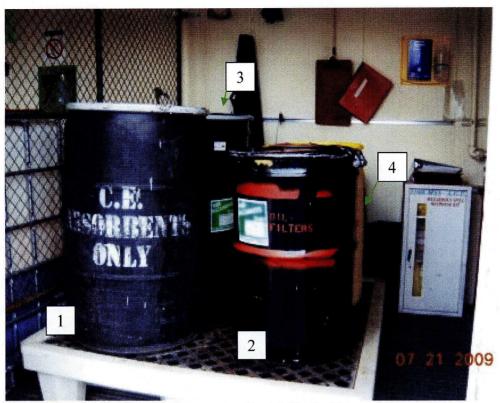
4. "Hazardous Waste" label

"Used Fuel Filters / JP-8"

"D001"

I observed that containers 3 and 4 designated in Picture 18 are satellite accumulation containers.

In Area 3 of the conex, I observed and took a picture of four containers of waste (Picture 19).



1) Photographer:

Daniel Chachakis

07/21/09

2) Date:

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022 conex

I recorded the following information from the containers as designated in Picture 19:

1. "C.E. Absorbent Only"

2. "Non-hazardous Waste" label

"Oil Filters"

3. "Non-hazardous Waste" label

"Fuel Filters"

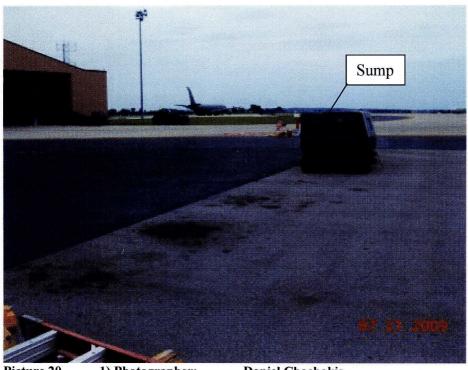
4. "Non-hazardous Waste" label

"Antifreeze"

I observed CO2 fire fighting capability in the area.

MSGT Thornton stated that radios are available, workers work in pairs, and that each area has an eyewash station.

I observed, and took a picture of red poles designating the location of a glycol reclamation sump (Picture 20). Bill Cully, hazardous materials and hazardous waste manager for Building 126, stated that planes are staged on the glycol pad in the winter, de-iced with glycol, and the waste glycol is collected in an underground storage tank; the waste glycol is then removed by Safety Kleen and shipped off-site as a non-hazardous waste. Mr. Cully stated that the waste glycol normally has a 40/60 or 50/50 split of glycol and water. Note: Closer access to the airfield was restricted; I deemed it unnecessary to get closer. Mr. Cully stated that the red poles designate the sump area (Picture 20).



1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Waste Glycol sump area

4) Location:

Near Building 5022 conex

Building 5020 Aerospace Ground Engine Shop

I observed, and took pictures of used oil related items in the Ground Engine Shop (Pictures 21, 22, and 23). I observed, and took a picture of a used oil can crusher (Picture 23).



Picture 23

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:

Daniel Chachakis 07/21/09

Used Oil Can Crusher

Building 5020

I observed, and took a picture of, a used oil can drainer (Picture 21).



Picture 21

1) Photographer:

2) Date:

3) Description:

4) Location:

Daniel Chachakis

07/21/09

Used Oil Drainer Building 5020

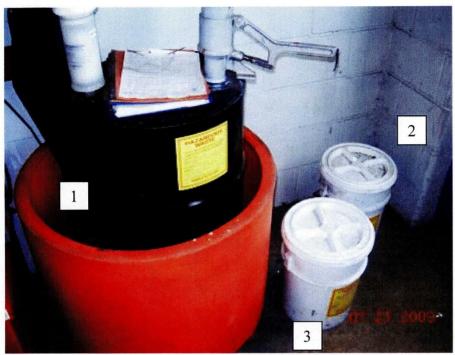
I observed, and took a picture of, a used oil / water separator sump (Picture 22).



Picture 22

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:
- **Daniel Chachakis**
- 07/21/09
- Sump for Oil / Water Separator
- Near Building 5022 conex

I observed, and took a picture of a hazardous waste satellite accumulation area with three containers (Picture 23).



Picture 23

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5020

I recorded the following information from the containers as designated 1 through 3 in Picture 23:

- 1. "Hazardous Waste" label, "RQ Waste Flammable Liquid", "D001"
- 2. "Hazardous Waste" label, "Blast Media", "D006"
- 3. "Hazardous Waste" label, "Parts Washer Filters", "D004, D005, D006, D007, D008, D009"

I reviewed a Hazardous Waste Communication Program binder kept in Building 5020. I observed that the binder contained a number of Form 55s: a historical record of training including job descriptions and job duties. The Air Force Reserve unit and the Air Force National Guard unit track training, and both units use Form 55. I reviewed the Form 55 for Bryant C. Daniels, Patricia A. Neuman, and Scott Shubert. Mr. McCoy stated that there are approximately 13 required / recognized hazardous waste handlers. I discovered that MSDSs are located in two locations.

Building 5022 Aircraft Maintenance

We entered the Repair and Reclamation Shop. I observed, and took a picture of a hazardous waste satellite accumulation area (Picture 24).



Picture 24

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/09
- 3) Description:
- Satellite Accumulation Area
- 4) Location:
- **Building 5022**

I recorded the following information from the containers designated 1 and 2 in Picture 24:

- 1. "Hazardous Waste" label, "Hazardous Waste Solids (Filters)", "D006"
- 2. "Hazardous Waste" label, "Hazardous Waste Solid Media", "D006"

I observed, and took a picture of a second hazardous waste satellite accumulation area with one container within building 5022 (Picture 25).



Picture 25

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/09
- 3) Description:
- Satellite Accumulation Area
- 4) Location:
- **Building 5022**

I recorded the following information from the container in Picture 25: "Hazardous Waste" label, "Waste, env hazardous substance solid (shop)", "D006." D006 is the characteristic waste code for cadmium.

I observed, and took a picture of another hazardous waste satellite area with three containers within building 5022 (Picture 26).



Picture 26

- 1) Photographer:
- Daniel Chachakis
- 2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022

I recorded the following information from the containers as designated 1 through 3 in Picture 26:

- 1. "Universal Waste" label, "Batteries", "Lithium"
- 2. "Universal Waste" label, "Batteries", "Dry Rechargeable"
- 3. "Hazardous Waste" label, "Waste Hazardous Substance, Solid", "D008, D011"

I observed that training records were on-site.

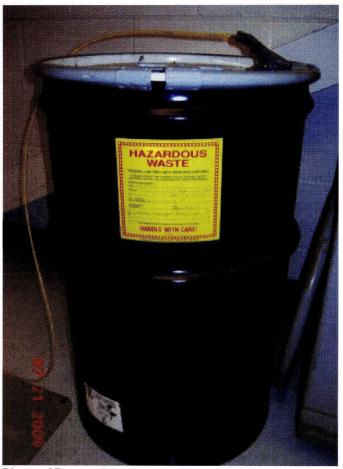
I observed that weekly inspection records were available in written form at each hazardous waste satellite accumulation area.

Building 5022 Metals Technology Shop

No deficiencies noted.

Building 5022 Sheet Metal Shop

I observed, and took a picture of one container in a hazardous waste satellite accumulation area (Picture 27).



Picture 27

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:
- **Daniel Chachakis**
- 07/21/09
- Satellite Accumulation Area
- **Building 5022 Sheet Metal Shop**

I recorded the following information from the container in Picture 27: "Hazardous Waste" label, "Waste Sealant Residue", "D007."

Building 5022 Propulsion Shop

I observed, and took a picture of four containers in a hazardous waste satellite accumulation area (Picture 28).



1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022 Propulsion Shop

I recorded the following information from the containers designated 1 through 4 in Picture 28:

- 1. "C.E. Absorbents Only"
- 2. "Hazardous Waste" label, "Hazardous Waste, Solid (Filters)", "D006"
- 3. "Non-hazardous Waste" label, "Used Oil"
- 4. "Non-hazardous Waste" label, "Used Oil Filters"

I requested container 2 in Picture 28 be opened; Mr. McCoy had an Airman open the container. I observed that there was more material in the container than filters; I observed that there was also what appeared to be floor sweep in container 2. I took a picture of the material in container 2, Picture 28 (Picture 29).



1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

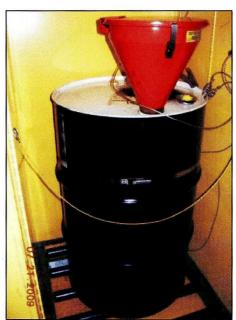
3) Description:

Satellite Accumulation Area, Container 2

4) Location:

Building 5022 Propulsion Shop

I observed a cabinet with a 55-gallon container inside; the outside cabinet label indicated that this is a waste container for contaminated fuel. I observed that there was no label or markings on the container indicating what material was inside the container. Mr. McCoy stated that the material in the container is handled as used oil. I took a picture of this container (Picture 30).



Picture 30

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/21/09
- 3) Description:
- Container without label
- 4) Location:
- **Building 5022 Propulsion Shop**

Building 5022 Non-destructive Inspection Shop

I observed, and took a picture of two containers in a satellite accumulation area (Picture 31).



Picture 31

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5022 Non-destructive Inspection Shop

I recorded the following information from the containers designated 1 through 4 in Picture 31:

- 1. "Hazardous Waste" label, "D011"; I observed that there was no other description of the contents of the container.
- 2. "Hazardous Waste" label, ""D011"; I observed that there was no other description of the contents of the container.

MSG Pete McAndrews added a description of the contents of the containers to the label on the containers in Picture 31.

Building 5024

I observed, and took a picture of a container of bag house dust hazardous waste satellite accumulation point (Picture 32).



Picture 32

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

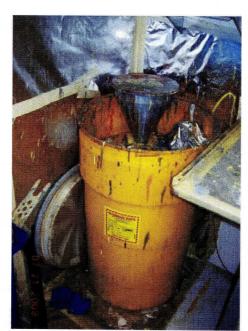
4) Location:

Near Building 5024

I recorded the following information from the container in Picture 32: "Hazardous Waste" label, "D007", "Plastic Media Spent."

Building 5024 Paint Shop

I observed, and took a picture of one container at a hazardous waste satellite accumulation area (Picture 33). I observed that there was no lid on the container.



Picture 33

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:

Daniel Chachakis

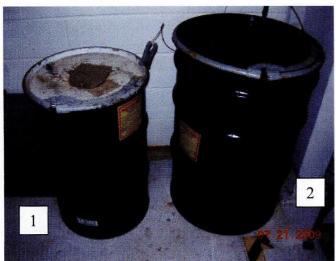
07/21/09

Container without label

Building 5024

I recorded the following information observed on the container in Picture 33: "Hazardous Waste" label, "D007", "Paint Waste."

I observed, and took a picture of a second hazardous waste satellite accumulation area with two containers (Picture 33).



Picture 34

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5024

I recorded the following information from the containers designated 1 and 2 in Picture 33:

- 1. "Hazardous Waste" label", "Waste, Environmentally Hazardous Substance", "D007"
- 2. "Hazardous Waste" label", "Paper Waste", "D007"

I observed, and took a picture of a third satellite accumulation area near the fuel cell side of the paint room (Picture 34).



Picture 35

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation Area

4) Location:

Building 5024

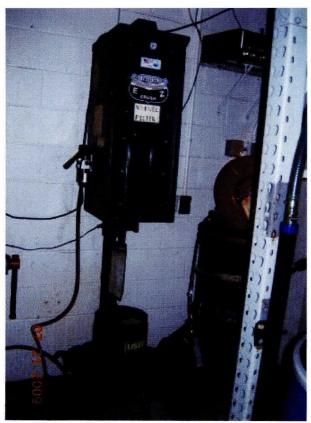
I recorded the following information from the containers designated 1 and 2 in Picture

- 1. "Hazardous Waste" label", "Adhesion Promoter", "D011, D035" 2. "Hazardous Waste" label", "Spent Sealant", "D006, D010"

Building 5006 Vehicle Maintenance

34:

I observed, and took pictures of two containers of used oil and one container of used oil filters (Pictures 36, 37 and 38).



Picture 36

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:
- **Daniel Chachakis**
- 07/21/09
- **Used Oil Container**
- **Building 5006**



Picture 37

1) Photographer:

2) Date:

3) Description: 4) Location:

Daniel Chachakis 07/21/09

Used Oil Filter Container

Building 5006



Picture 38

1) Photographer: 2) Date:

3) Description:4) Location:

Daniel Chachakis

07/21/09

Used Oil Container Building 5006

Outside Building 5006

I observed, and took a picture of the inside of an outdoor hazardous waste accumulation conex (Picture 39).



Picture 39

1) Photographer:

Daniel Chachakis

2) Date:

07/21/09

3) Description:

Satellite Accumulation

4) Location:

Outside Building 5006

I recorded the following information from the containers designated 1 through 4 in Picture 39:

- 1. "Non-hazardous Waste" label", "Paint Thinner Rags"
- 2. "Hazardous Waste" label", "Flammable Liquid", "D001"
- 3. "Hazardous Waste" label, "Flammable Liquid", "D001"
- 4. "Non-hazardous Waste" label, "Used Oil"

I had the facility representatives who were with me open container 1 (documented in Picture 39). I observed that there was a strong solvent smell from the rags in the container after the container was opened. The representatives were unable to provide me a profile for the waste in container 1 upon my request.

Record Review, Contingency Plan

I returned to the conference room, and began the review of the contingency plan. I made the following observations related to the contingency plan:

- Did not contain the names of the emergency coordinators, only positions.

- Lists four used oil above ground storage tanks, one each at the Power Production Area, Vehicle Maintenance Facility, AAFES Car Care Center, and Auto Hobby Shop.
- Lists two underground storage tanks, one holding recovered JP-8 in a doubled walled tank, and one holding recovered deicer liquids in a 20,000 tank (the type of tank was not documented in the contingency plan).

We ended the first day, and departed Scott AFB at approximately 4:30 PM.

Site Tour: DAY 2

I continued the review of the contingency plan, and made the following observations:

- The contingency plan did not describe actions required for fires or explosions. Chief Kempton, of the Fire Department of Scott AFB, stated that each building has a pre-fire response plan. We discussed the fact that the Integrated Contingency Plan can refer to the pre-fire response plans. I confirmed that the less-than-90-day storage building has its own Contingency Plan.

Record Review, Manifests

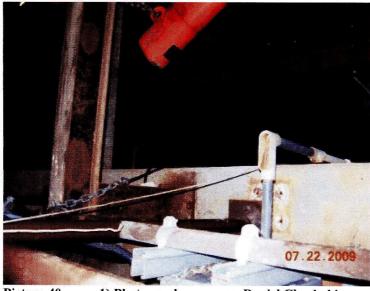
I reviewed the following manifests.

| 005389514JJK 005389661JJK | Carla A. Daggitt Carla A. Daggitt | 01/06/09 05/06/09 | |
|--|---|--|---|
| 004158323JJK 004158283JJK 000730426FLE 000730454FLE 000730424FLE 000730350FLE 000730285FLE | Kevin Emerson Kevin Emerson Kevin Emerson Kevin Emerson Kevin Emerson Kevin Emerson Kevin Emerson | 11/05/08 11/05/08 09/23/08 08/11/08 06/25/08 05/14/08 03/18/08 | D001, 2, 7; F002, 3, 5 D001, 7, 8, 10, 35; P001* D001, 2, 7, 11; U112; P001 D001, 2, 7, 8; F003, 5; P001 |
| 000255698FLE | Kevin Emerson | 01/07/08 | D001, 2, 6, 8 |
| 000730248FLE 000730225FLE 000730199FLE 000730160FLE | Kevin Emerson Kevin Emerson Kevin Emerson Kevin Emerson John Moreir | 11/29/07 10/01/07 09/04/07 06/07/07 | D001, 6, 8, 35; P001 D001, 6, 8; P001 D001, 6, 7; F003, 5; P001 D001, 6, 7, 10 |
| 000730131FLE 000730087FLE | Mark E. McCoy John Morris Vtesh Challappa | 04/12/07 02/02/07 | D006, 7, P001 D001, 5, 6, 7, 8, 9 |

^{*}P001 - Warfarin

Waste Water Treatment Plant

At the wastewater treatment plant, we met with Dan Yann, Work Leader. Mr. Yann provided me with lab results for the aqueous waste stream and lab results for the wastewater. I observed, and took pictures of the Inflow Area (Picture 40), the Primary Clarifiers (Picture 41), and the "Bug" Eating Chamber (Picture 42). I added 10% contrast and brightness to Picture 42.



Picture 40

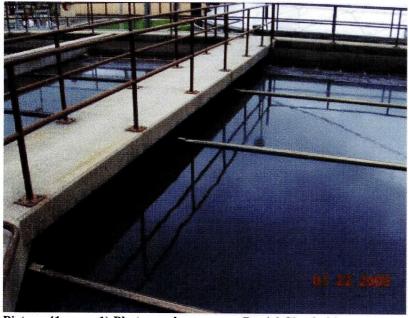
- 1) Photographer:
- 2) Date: 3) Description:
- 4) Location:

Daniel Chachakis

07/22/09

In-flow

Wastewater Treatment Area



Picture 41

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:
- **Daniel Chachakis**
- 07/22/09
- **Primary Clarifiers**
- Wastewater Treatment Area



1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

"Bug" Eating Chamber

4) Location:

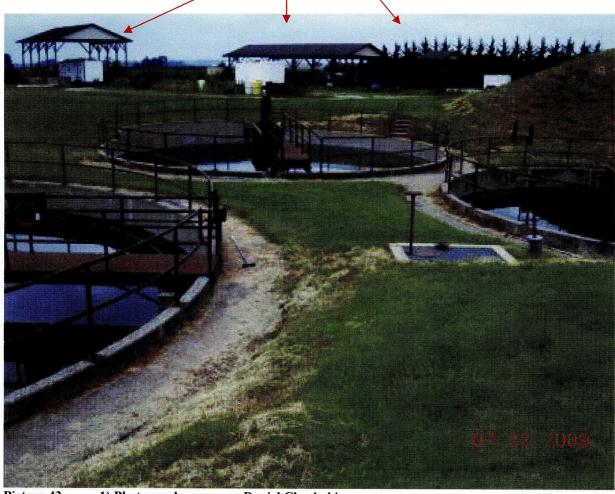
Wastewater Treatment Area

It appeared that the "bug" eating chamber should be treated as a lock-out / tag-out area.

Hazardous Materials Storage Area

I observed, and took a picture of a hazardous material storage area within the confines of the wastewater treatment system property (Picture 43), behind the additional clarifiers.

Hazardous Materials Storage Area



Picture 43

1) Photographer: 2) Date:

Daniel Chachakis

07/22/09

3) Description:

Hazardous Materials Storage Area

4) Location:

Wastewater Treatment Area

I drew a diagram of the hazardous materials storage area (Diagram 5), and took picture of the materials within this area.

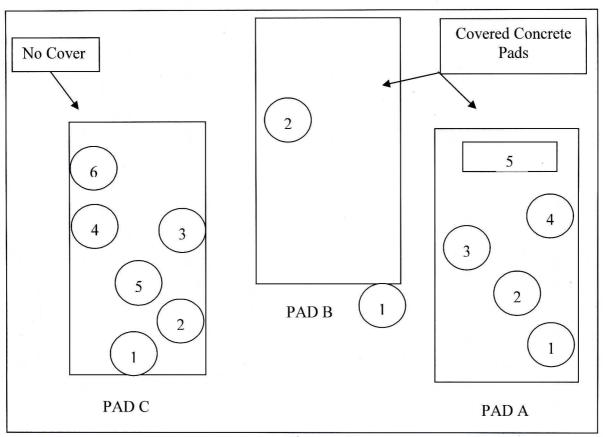


Diagram 5

I took a picture of Pad A (Picture 44).



Picture 44

- 1) Photographer:
- 2) Date:
- 3) Description:
- 4) Location:

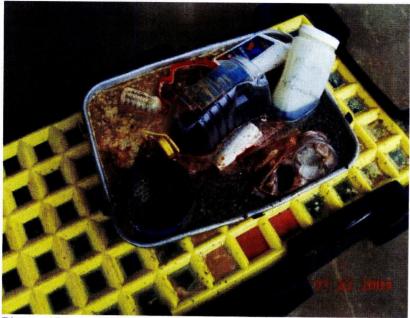
Daniel Chachakis

07/22/09

Hazardous Materials Storage Area, Pad A

I took pictures of the various materials on Pad A, B and C using the locations as established in Diagram 5.

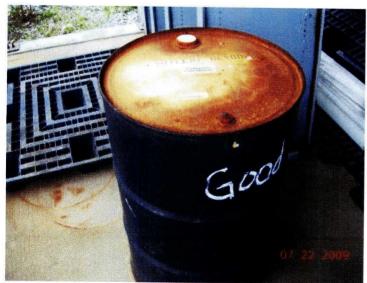
Pad A, location A-1: Pan with mixed Materials (Picture 45).



Picture 45

- 1) Photographer:
- Daniel Chachakis
- 2) Date:
- 07/22/09
- 3) Description:
- Pan with mixed materials, Pad A-1
- 4) Location:
- Wastewater Treatment Area

Pad A, location A-2: container with the markings and labels, "Ethylene Glycol", and "Good" (Picture 46).



Picture 46

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/22/09
- 3) Description:
- Container, Pad A-2
- 4) Location:
- Wastewater Treatment Area

Pad A, location A-3: 12 one-gallon containers, labeled "Hydrogen Chloride" (Picture 47). I observed that the labels were in poor condition and fading from the weather or other reason.



Picture 47

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Containers, Pad A-3

4) Location:

Wastewater Treatment Area

Pad A, location A-4: seven containers with the label, "Muriatic Acid" (Picture 48).



Picture 48

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 3) Description:
- 07/22/09
- Containers, Pad A-4
- 4) Location:
- Wastewater Treatment Area

Pad A, Location A-5: approximately 30 containers with the label, "Muriatic Acid" (Picture 49)



Picture 49

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Containers, Pad A-5

4) Location:

Wastewater Treatment Area

I observed, and took a picture of five containers with the label, "Ethylene Glycol Uninhibited Antifreeze" (Picture 50).



Picture 50

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Containers, Pad A-6

4) Location:

Pad B, location B-1: One container with no label or markings identifying the contents of the container (Picture 51). I observed a grease-like substance on the top of the container. I pushed the container to verify if there was material in the container, and there was resistance. I estimated that the container was nearly full.



Picture 51

- 1) Photographer:
- Daniel Chachakis
- 2) Date:
- 07/22/09
- 3) Description:
- Container, Pad B-1
- 4) Location:
- Wastewater Treatment Area

Pad B, location B-2: I observed a trailer located in this area (Picture 52); it appeared to be a latrine trailer.



Picture 52

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/22/09
- 3) Description:
- Container, Pad B-2
- 4) Location:
- Wastewater Treatment Area

Pad C: I took an overview picture of Pad C (Picture 53).



Picture 53

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Pad C

4) Location:

Wastewater Treatment Area

Pad C, location C-1: I took a picture of a container with the markings, "Drum #2" and "Everything" (Picture 54).



Picture 54

1) Photographer:

Daniel Chachakis

2) Date:

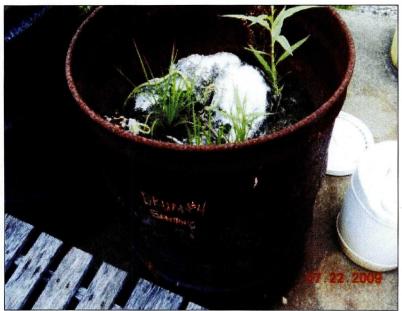
07/22/09

3) Description:

Pad C-1

4) Location:

Pad C, location C-2: I took a picture of a container with the markings, "Drum #4" and "Everything" (Picture 55).



Picture 55

1) Photographer:

Daniel Chachakis

2) Date:

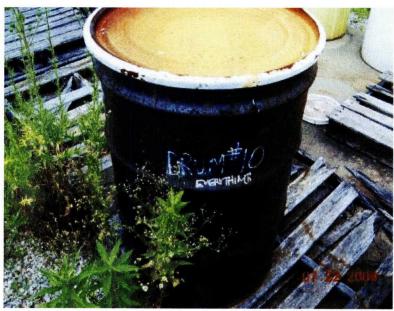
3) Description:

07/22/09 Pad C-2

4) Location:

Wastewater Treatment Area

Pad C, location C-3: I took a picture of a container with the markings "Drum #10" and "Everything" (Picture 56). I observed that the container was closed. I pushed the container, and heard a sloshing sound.



Picture 56

1) Photographer:

Daniel Chachakis

2) Date:

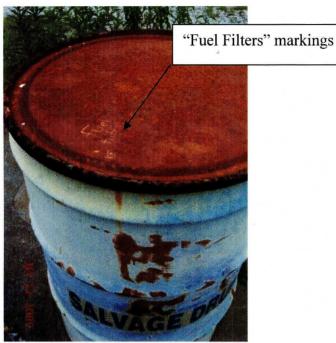
07/22/09

3) Description:

Pad C-3

4) Location:

Pad C, location C-4: I took a picture of a container with the markings, "Fuel Filter Drum" (Picture 57). I observed that the ring was not on the container. I opened the container, and observed the fuel filters inside (Picture 58), and observed that there was a fuel smell when the lid was off the container.



Picture 57

1) Photographer:

Daniel Chachakis

2) Date:

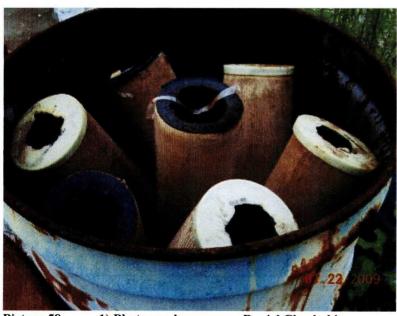
07/22/09

3) Description:

Pad C-4

4) Location:

Wastewater Treatment Area



Picture 58

1) Photographer:

Daniel Chachakis

2) Date:

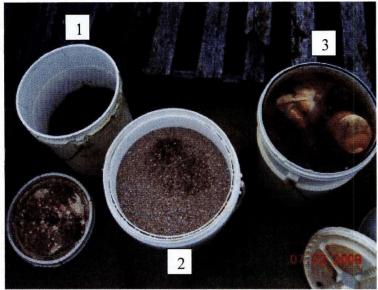
07/22/09

3) Description:

Pad C-4, inside the container

4) Location:

Pad C, location C-5: I took a picture of three 5-gallon containers (Picture 59). Note I took the cover off container 3 for Picture 59; containers 1 and 2 did not have covers at the time of the inspection.



Picture 59

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09 Pad C-5

3) Description:4) Location:

Wastewater Treatment Area

Pad C, location C-6: I took a picture of a container with sampling tubes and off-color liquid and materials (Picture 60).



Picture 60

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Pad C-6

4) Location:

I observed, and took a picture of a sign on the fence of the wastewater treatment area indicating a warning for the explosive ordnance disposal training area (Picture 61).



Picture 61

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

explosive Ordnance Range Boundary

4) Location:

Wastewater Treatment Area

Document Review (Continued)

We returned to the main conference room.

I reviewed the less-than 90-day Hazardous Waste Centralized Accumulation Site, building 3306, Site Specific Contingency Plan. I noted that paragraph 3, Response Actions, contains response direction for spills, fires and explosions.

I reviewed manifests for the shipment of waste glycol.

| 004395374JJK Carla A. Daggitt | Waste, Non-hazardous Liquids 05/13/09 Profile #CH341466 | 4400G, no waste code, 1 TT |
|----------------------------------|--|-----------------------------|
| 004395373JJK Carla A. Daggitt | Waste, Non-hazardous Liquids 05/13/09 | 5,200G, no waste code, 1 TT |
| 004395372JJK Carla A. Daggitt | Waste, Non-hazardous Liquids 05/13/09 Profile #CH341466 | 5,200G, no waste code, 1 TT |
| 004395371JJK Carla A. Daggitt | Waste, Non-hazardous Liquids 05/13/09 | 5,100G, no waste code, 1 TT |

I reviewed two additional manifests.

001736901SKS

Waste Paint Related Material 1 DM, 36 P

D001, 18, 35, 39; F003, 5

Elizabeth Toftmark

04/28/09

001736900SKS

Waste Combustible Liquid (Petroleum Naphtha)

1 DM, 8G, D039

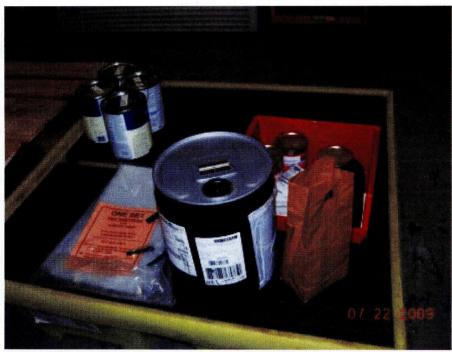
1DF, 4G, D039

Elizabeth Toftmark

04/28/09

Building 555 Hazardous Materials Pharmacy

In building 555, I observed, and took a picture of accumulated materials ready for transportation to the less-than 90-day hazardous waste storage area for further evaluation (Picture 62). The area manager stated that the accumulation area in building 555 is emptied weekly.



Picture 62

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Accumulated possible hazardous waste

4) Location:

Building 555

I observed building 555 emergency spill equipment and kits, protective equipment locker, and an eyewash station.

Veterinarian Clinic, 853 South Drive

In the veterinarian clinic, I spoke with SSG Yoder. SSG Yoder stated that used or expired medicines are returned to the manufacturer, and that drugs are not normally disposed of in the sink.

Health Center, Building 1530

In the health center (hospital), we met with Bart Portell. I received a medication list of the items stocked at the hospital. Mr. Portell stated that expired medications are returned to the logistics warehouse for further shipment back to the manufacturer. Mr. Portell stated that if used or expired medicine cannot be returned through pharmaceutical channels, these expired medications would be sent to the less-than 90-day storage area. Mr. Portell stated that there is a satellite accumulation area on-site for the accumulation of used batteries.

Mr. Partell stated that there in no incinerator on-site. I observed, and took a picture of a large garbage compactor on-site (Picture 63).



Picture 63

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Garbage compactor

4) Location:

Hospital

We met SGT Arnold and discussed pharmaceuticals. SGT Arnold stated that unused pharmaceuticals are returned to the manufacturer through the Guaranteed Returns Program (GRX); sometimes the hospital receives monetary credit for the returned pharmaceuticals; but in either case, the pharmaceuticals are not managed through the hazardous waste process and there are no hazardous waste evaluations for the pharmaceuticals returned by the hospital.

Power Production Building

We went into the Power Production Building in the Construction Engineer (CE) Yard.

I observed an oil filter crusher. I observed, and took a picture of a used oil tank (Picture 64).



Picture 64

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

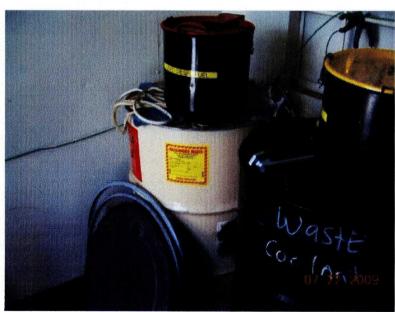
3) Description:

Used Oil Tank

4) Location:

CE Yard

I observed, and took a picture of a satellite accumulation area with one container of hazardous waste (Picture 65).



Picture 65

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Satellite Area

4) Location:

CE Yard

I recorded the following information from the hazardous waste satellite container 4 in Picture 39: "Hazardous Waste" label, Waste Diesel Fuel", "D001." *HVAC Area*

I observed, and took a picture of a satellite accumulation area which had containers present; none of the containers held hazardous waste (Picture 66).



Picture 66

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

HVAC Area

4) Location:

CE Yard

I recorded the following information from labels on containers 1 though 4 from the hazardous waste satellite accumulation area in Picture 39:

- 1. "Non-hazardous Waste" label, "Used Oil"
- 2. "Non-hazardous Waste" label, "Used Oil"
- 3. "Non-hazardous Waste" label, "Used antifreeze"
- 4. "Non-hazardous Waste" label, "Used sweeping compound"

Heavy Equipment Area

I observed, and took a picture of a hazardous waste satellite accumulation area in the Heavy Equipment Area (Picture 67).



Picture 67

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Heavy Equipment Area

4) Location:

CE Yard

I recorded the following information from labels on containers 1 though 4 in the hazardous waste satellite accumulation area in Picture 67:

- 1. "Non-hazardous Waste" label, "Used Oil"
- 2. "Non-hazardous Waste" label, "Oil Soaked Rags and Absorbents"
- 3. "Non-hazardous Waste" label, "Used Power Orange"
- 4. "Non-hazardous Waste" label, "Antifreeze"

I observed, and took a picture of a used oil spill on the parking lot of the heavy equipment area (Picture 68).



Picture 68

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Oil Spill, Heavy Equipment Area

4) Location:

CE Yard

I observed, and took pictures of two dumpsters and their contents in the Heavy Equipment area (Pictures 66 and 67).



Picture 69

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Dumpster 1

4) Location:

CE Yard



Picture 70

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Dumpster 2

4) Location:

CE Yard

I observed, and took a picture of a fluorescent bulb in the scrap metal dumpster (Picture 71).



Picture 71

1) Photographer:

Daniel Chachakis

2) Date:

07/22/09

3) Description:

Scrap Metal Dumpster

4) Location:

CE Yard

We returned to the conference room, and then departed at approximately 4:45 PM.

Site Tour: DAY 3

We arrived on site at approximately 7:55 AM. We met in the conference room, and then continued our site tour.

Building 3275 Medical Logistics

We proceeded to the Medical Logistics warehouse, and met with Mr. Charles Smith. I observed pharmaceuticals ready for return to the manufacturer. Mr. Smith stated that a return occurs approximately every 45 days; usually a return contains a "pallet full" of pharmaceuticals. I observed, and took a picture of Area 1 of the warehouse (Picture 72).



Picture 72

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:4) Location:

Area 1 Medical Warehouse

I observed, and took a picture of the materials in Area 2 (Picture 73).



Picture 73

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Area 2

4) Location:

Medical Warehouse

I recorded some of the materials in the open cardboard box in Picture 73:

- 1. "Cimetidine Hydrochloride Oral Solution", "2.8% Alcohol"
- 2. "Iron Supplement Drops", "0.2% Alcohol"
- 3. "Acetic Acid Optic Solution USP", "2%"
- 4. "Retracaine Hydrochloride", "0.5%"
- 5. "Amiodarone HCL", "150 mg"
- 6. "Drysol Anhydrous Ethyl Alcohol", "93%"

I observed eight stacked plastic containers in Picture 73. I opened, took a picture of, and recorded some of the materials in the top left container (Picture 74).



Picture 74

- 1) Photographer:
- Daniel Chachakis
- 2) Date:
- 07/23/09
- 3) Description:
- Inside the Top left container, picture 73
- 4) Location:
- Medical Warehouse, Area 2

I recorded the following information for some of the containers in picture 74:

- 1. "Hydrochloride", "300mg", "tablets"
- 2. "Wart Remover", "40% salicylic acid"
- 3. "Avita Cream", "0.025%", "stearic acid", "isopropyl myristate", "sorbic acid", "stearyl alcohol"

I observed, and took a picture of eight additional containers of expired pharmaceuticals available for return (Picture 75).



Picture 75

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Containers ready for return

4) Location:

Medical Warehouse

Mr. Smith stated that the warehouse uses a "just-in-time" ordering system in order to store less materials on-site.

I observed that the warehouse was storing oxidizers and flammables in the same room; the materials are products, not waste, but should not be stored in the same area.

Building 450 375 / 932nd Reserve

We proceeded to building 450. *Aerospace Ground Equipment Repair Shop*

We met with Robert Vailancourt within the *Aerospace* Ground Equipment Repair Shop. I observed, and took a picture of a satellite accumulation point (Picture 76). I observed that all the containers had non-hazardous waste labels.



Picture 76

- 1) Photographer:
- Daniel Chachakis
- 2) Date:
- 07/23/09 Containers
- 3) Description:4) Location:
- **Aerospace Ground Equipment Repair Shop**

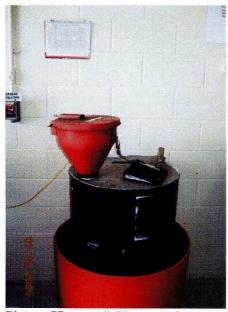
I recorded the following information from labels on containers 1 though 5 from the hazardous waste satellite accumulation area in Picture 76:

- 1. "Non-hazardous Waste" label, "Used Absorbent Pads"
- 2. "Non-hazardous Waste" label, "Used Hydraulic Fluid"
- 3. "Non-hazardous Waste" label, "Used Filters"
- 4. "Non-hazardous Waste" label, "Used Oil"
- 5. "Non-hazardous Waste" label, "Used Oil"

We opened container one as described in Picture 76. I observed that there was no solvent smell from the contents of the container.

I observed, and took a picture of a black container in a red secondary containment container that did not have a label of markings to describe the contents of the container (Picture

77). We met a worker named Kevin who stated that contents of the container are shipped as offsite as used oil. Kevin put a used oil label on the container prior to our departure.



Picture 77

1) Photographer:

Daniel Chachakis 07/23/09

2) Date:

3) Description:

Container, No label or markings

4) Location:

Aerospace Ground Equipment Repair Shop

I observed, and took a picture of a five-gallon pail in a satellite accumulation area (Picture 78).



Picture 78

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Five gallon pail

4) Location:

Aerospace Ground Equipment Repair Shop

I recorded the following information from the label on the container in the hazardous waste satellite accumulation area in Picture 77: "Hazardous Waste" label; "Used Ozzy Filters."

932nd Structural Paint Shop

We proceeded into the paint shop. I observed, and took a picture of a satellite accumulation area with a container in position (Picture 79).



Picture 79

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/23/09
- 3) Description:
- **Hazardous Waste Container**
- 4) Location:
- **Aerospace Ground Equipment Repair Shop**

We opened the container in Picture 79, and there was material in the container. I observed that there were no labels or markings on the container to describe the contents of the container. During the course of the inspection, I observed Kevin put a label on the container with the words, "Hazardous Waste", "Barrier Paper", "D005, 6, 7, 8, 10."

I observed, and took a picture of three containers in a second hazardous waste satellite accumulation area (Picture 80).



Picture 80

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/23/09
- 3) Description:
- **Hazardous Waste Containers**
- 4) Location:
- **Aerospace Ground Equipment Repair Shop**

I recorded the following information from labels on containers 1 though 3 from the hazardous waste satellite accumulation area in Picture 80:

- 1. "Hazardous Waste" label, "Aerosol Flammable"
- 2. "Hazardous Waste" label, "Aircraft Sealing Compound"
- 3. "Hazardous Waste" label, "D007"; description not on label; "Soiled Rags" on cover.

I observed, and took a picture of a third hazardous waste satellite accumulation area (Picture 81).



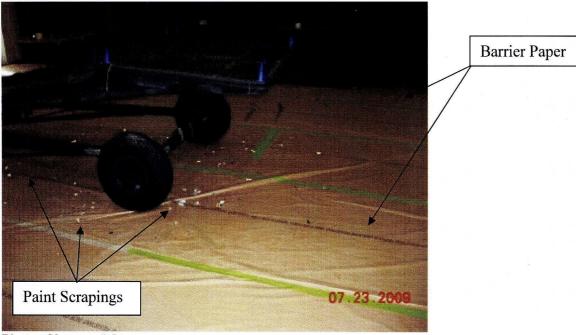
Picture 81

- 1) Photographer:
- **Daniel Chachakis**
- 2) Date:
- 07/23/09
- 3) Description:
- **Hazardous Waste Containers**
- 4) Location:
- **Aerospace Ground Equipment Repair Shop**

I recorded the following information from labels on containers 1 and 2 from the hazardous waste satellite accumulation area in Picture 81:

- 1. "Hazardous Waste" label, "D007"; description not on label
- 2. "Hazardous Waste" label, "Paint debris", "D007"; "Chromate Paint Waste / Solids" on cover

I observed, and took a picture of the floor of the Preparation Room (Picture 82).



Picture 82

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Floor of Preparation Room

4) Location:

Aerospace Ground Equipment Repair Shop



Picture 83

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Floor of Preparation Room

4) Location:

Aerospace Ground Equipment Repair Shop

I observed that there are paint scrapings on the barrier paper on the floor of the Preparation Room (Picture 82). I observed that there is no barrier between the Preparation Room and the other areas of the facility (Picture 83). Kevin stated that the barrier paper is managed as hazardous waste because the paint chips, depending on the age of the equipment being serviced, can contain various metals subject to hazardous waste disposal rules. We discussed the possibility of adding procedures to prevent the migration of the metal scrapings off of the barrier paper, with possible transport routes from the bottom of the worker's boots and the wheels of the equipment being serviced.

We proceeded to the Paint Room. I observed, and took a picture of paper on the floor of the paint room (Picture 84).



Picture 84

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

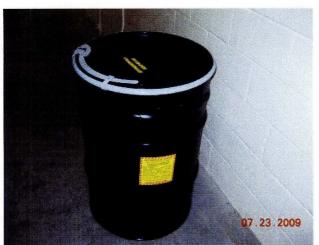
Floor of Paint Room

4) Location:

Aerospace Ground Equipment Repair Shop

Kevin stated that the paper on the floor of the Paint Room, in Picture 84, is managed as hazardous waste.

I observed, and took a picture of a container at a hazardous waste satellite accumulation area (Picture 85).



Picture 85

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Satellite Container

4) Location:

Aerospace Ground Equipment Repair Shop

I recorded the following information from the label on the container in the hazardous waste satellite accumulation area in Picture 85: "Hazardous Waste" label, "Used Faint Filters", "D007."

Flight Line Maintenance

I observed, and took a picture of the hazardous waste satellite accumulation area in the Flight Line Maintenance area (Picture 86).



Picture 86

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Satellite Container s

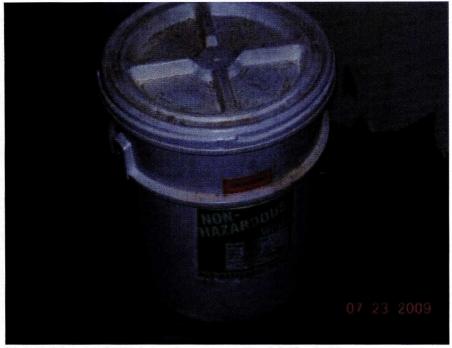
4) Location:

Flight Line Maintenance Area

I recorded the following information from labels on containers 1 through 4 from the hazardous waste satellite accumulation area in Picture 86:

- 1. "Non-hazardous Waste" label, "Used Fuel Filters"
- 2. "Non-hazardous Waste" label, "Used Oil"
- 3. Markings with the words, "Used Absorbent Material"
- 4. "Hazardous Waste" label, "Engine Wash", "D006"

I observed, and took a picture of a five gallon container with a non-hazardous waste label (Picture 87).



Picture 86

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Container with a non-hazardous waste label

4) Location:

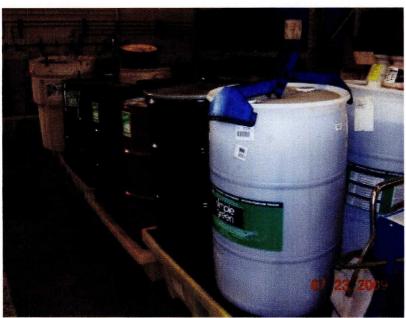
Flight Line Maintenance Area

I recorded the following information from the label on the container in Picture 86: "Non-hazardous Waste" label, "Oil Waste." We opened the pail in Picture 86; I observed that the container contained filters.

Vehicle Fleet Maintenance Building (Transportation)

We proceeded to the vehicle fleet maintenance building.

I observed, and took a picture of a waste material accumulation area (Picture 87).



Picture 87

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:4) Location:

Waste material accumulation point Vehicle Fleet Maintenance Building

I observed that the containers in Picture 87 all had "Non-hazardous Waste" labels or product labels, and included the terms, "Used Diesel", "Fuel Filters", and "Used Oil."

I observed, and took a picture of a used oil container (Picture 88).



Picture 88

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

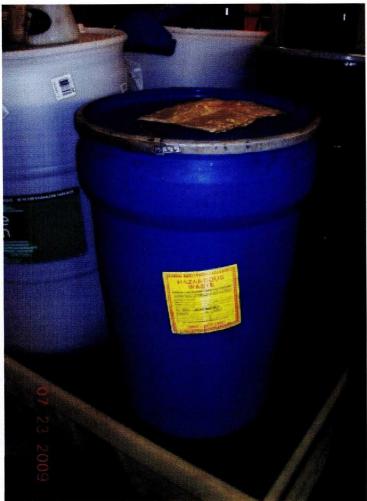
Used Oil container

4) Location:

Vehicle Fleet Maintenance Building

I observed that a label with the words, "Used Oil" was on the container in Picture 88.

I observed, and took a picture of a container in a hazardous waste satellite accumulation area (Picture 89).



Picture 89

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Hazardous Waste satellite container

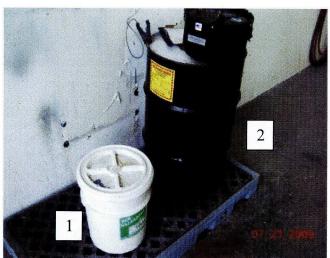
4) Location:

Vehicle Fleet Maintenance Building

I recorded the following information from the label on the container in Picture 89: "Hazardous Waste" label, "Spent Aerosol Cans"; I observed that there was no hazardous waste code marked on the label or elsewhere on the container. Kevin added the waste code to the label prior to completing the inspection in this area.

Paint Shed

We proceeded to a Paint Shed. I observed, and took a picture of two containers in a hazardous waste accumulation area within the Paint Shed (Picture 90).



Picture 90

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Hazardous Waste satellite container

4) Location:

Paint Shed

I recorded the following information from labels on containers 1 and 2 from the hazardous waste satellite accumulation area in Picture 90:

- 1. "Non-hazardous Waste" label, "Used Respirator Filters"
- 2. "Hazardous Waste" label, "Waste Paints and Reducors"; I observed that there was no hazardous waste code on the label or elsewhere on the container.

Kevin stated that after paper is used in the Paint Shed, it is sent off-site as non-hazardous solid waste.

I observed, and took a picture of a container (Picture 91).



Picture 91

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Hazardous Waste satellite container

4) Location:

Vehicle Fleet Maintenance Building

I observed that the container in Picture 91 was marked with the words, "Dirty Rags." We opened the container, and a slight solvent smell wafted up from the rags in the container. We discussed the fact that these rags might meet a hazardous waste characteristic. I asked what used product was most likely on the rags, and the answer was, "Kral Klean" and "First Clean."

Base Ride Around

We rode around the base to visit other base facilities. I observed that there was an Arts and Crafts Center. We did not enter the Arts and Crafts Center.

AAFES Gas Station

I observed, and took pictures of waste oil tanks and used battery storage at the AAFES Gas Station (Pictures 92 and 93). I observed that Firestone, Inc. has taken over management operations of the AAFES Gas Station.



Picture 92

1) Photographer:

Daniel Chachakis

2) Date:

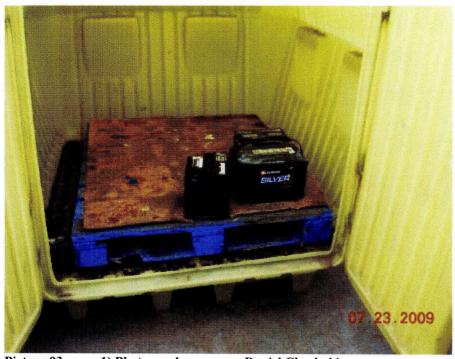
07/23/09

3) Description:

Used Oil Container

4) Location:

AAFES Gas Station



Picture 93

1) Photographer:

Daniel Chachakis

2) Date:

07/23/09

3) Description:

Used Battery Container

4) Location:

AAFES Gas Station

Record Review

I reviewed waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), weekly container inspection logs, and the contingency plan during the course of the inspection. I completed a Large Quantity Generator (LQG) checklist during the record reviews. See Attachment B.

Closing Conference

The closing conference was attended by the inspectors and the facility representatives. The facility representatives were led by LTC Johnson.

We summarized the hazardous waste, underground storage tanks, SPCC, wastewater treatment NPDS permit, MS4 permit, industrial storm water, and general construction storm water permit issues identified during the inspection. We also discussed the flammable / oxidizer storage issue.

Hazardous waste issues included the hazardous material storage area within the wastewater treatment area, hazardous waste determinations for two used solvent rag streams, labeling and marking of hazardous waste storage containers, the Aerospace Ground equipment repair paint scrapping area, and the disposal of pharmaceutical waste.

The inspection concluded at approximately 1:00 PM.

Inspection Follow-up

On 09/08/09, I sent a Handler Update Form to Illinois Environmental Protection Agency to remove the TSDF designation for Scott AFB from RCRAInfo.

Attachments

ATTACHMENT A

Sign In Roster, Opening Conference

| tal - Mil | l webs Fild | |
|--|--|---------------------|
| 15/21/09 Mul | 1. 115 2. 115 - 2012 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 2013 - 201 | Moce. |
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| Jan Bergann | 376/ Maria Pagina | 250 1750 |
| Vanessa Frangos | 8)5 CBS/CEAN WATER | 25Tu = 22Z44 |
| Kevik English | 375 (62 C6 M N | \$56-2134 |
| GARY 2. PORTELL | 375 MD SS/SGSMF | 256-5110 |
| STORM PRITERSON | 375 286/42712 | 613 253-2046 |
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND / FIELD OPERATIONS SECTION RCRA INSPECTION REPORT

GENERAL FACILITY INFORMATION

| | | | COTEST : | 1111 0111111111110 | | |
|-------------------|-----------------------|---------------|------------|---------------------------------------|-----------------------|--------------|
| USEPA ID #: | IL7570024177 | | | IEPA ID #: | | |
| Facility Name: | Scott Air Force Base | 9 | | | Phone #: 6 8 | -256-5035 |
| Location | Scott Air Force Base | 9 | | | County: 5+ (| <i>lar</i> |
| City: | Scott Air Force Base | e Sta | ate: Illin | ois | Zip Code: 622 | 25 |
| Region: | | Inspection Da | ite: 21- | 23 Jul 09 | Time: 0800 | |
| Weather: 🗘 | ndy, Warn | 1 | | | | |
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| Notified As: | LQG | | Regulate | ed As: LQG | | |
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| CEI: 🛛 CME | /O&M: CSI: | NRR: | CCI: | ☐ PIF: ☐ | CVI: CSE: | ☐ CAO: ☐ |
| FUI to: | Other: Ma | illimedi | <u></u> | | | |
| | Notifi | CATION INFO | ORMATI | on (EPA 87 | 00-12) | |
| Notification Da | te: 08/03/1987 | (initial) | | · · · · · · · · · · · · · · · · · · · | | (subsequent) |
| | PART A PERMIT | INFORMATIC | on (EP/ | A 3510-3 or | R EPA 8700-23) | |
| Part A Date: | NA | Amended: | | \ | Withdrawn: | |
| | | PART B PE | RMIT IN | IFORMATION | | |
| (Check one if a | pplicable) Applicatio | n Submitted? | P | ermit Issued? | ☐ Date: | |
| | | ACTIVE | ENFOR | CEMENT | | |
| Date facility ref | erred to: USEPA: | NA | IAGO: | NA (| County State's Attori | ney: NA |
| | | ACTIVE ENF | ORCEM | ENT ORDER | S | |
| CACO: | NA | CAFO: | NA | F | ederal Court Order: | NA |
| Consent Decre | e: NA | IPCB Order: | NA | S | tate Court Order: | NA |

TSD FACILITY ACTIVITY SUMMARY

| Activity by Process | On Part | On Part | Activity | | Being done during | Exempt per | On Annual | Report: |
|---|---|----------------------------|------------------|------------------------------|-------------------|--------------|-----------|---------|
| Code | A? | B? | ever done? | Closed? | inspection? | 35 IAC Sec: | | |
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X = CONTINUING VIOLATIONS

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|------------|--|-------------|
| | PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.) | |
| | SUBPART A: GENERAL | |
| 2.111 | Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? | |
| | Yes No N/A Have hazardous wastes been identified for purposes of compliance with Part 728? Yes No N/A | 722.111 |
| 8.121(a) | Has the generator correctly determined if the solid waste(s) it generates is a special waste? YesNoN/A | |
| 2.112(a) | Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes | 808.121(a) |
| | | 722.112(a) |
| 22.112(c) | Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? YesX No N/A | 722.112(c) |
| | SUBPART B: THE MANIFEST | 722.112(0) |
| 22.120(a) | Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes X No N/A | |
| 22.120(b) | Does the manifest designate a facility permitted to handle the waste? Yes No No N/A | 722.120(a) |
| 22.120(ď) | Has the generator shipped any waste that could not be delivered to the designated facility? Yes NoX N/A | 722.120(b) |
| | Section 722.121 Acquisition of Manifests | 722.120(d) |
| 22.121(a) | Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? | |
| 22.121(a) | | 722.121(a) |
| 722.121(b) | Yes No N/A_* | |
| | - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes No N/A_ X | 722.121(b) |
| | Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? | |
| 722.122 | Yes No N/A | 722.122 |
| 22.123(a) | Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? | |
| | Yes No N/A - obtained the handwritten signature and the date of acceptance by the initial transporter? | |
| | Yes No N/A retained one copy as required by Section 722.140(a)? | 722.123(a) |
| | Yes No N/A apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? | |
| 22.12243 | Yes No N/A N/A has the generator apparently given the remaining copies to the transporter? | 722.123(b) |
| 22.123(b) | Yes No N/A | , 22.123(0) |
| (22.123(c) | has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? YesNA NoN/A N/ANON/A | |
| | | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|------------------|--|-----------|
| | SUBPART C: PRE-TRANSPORT REQUIREMENTS | |
| | Is there any hazardous waste ready for transport off-site? | |
| 122.130 | YesNo_X N/A | 722.130 |
| | If so, is the generator complying with the pre-transport requirements in Subpart C? Yes No N/A | |
| | | |
| | Section 722.134 Accumulation Time | |
| (722.134(a)) | Has the generator complied with the following requirements: Yes No N/A | |
| | A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, | |
| (722.134(a)(1)) | and CC? | |
| | YesX No N/A | |
| | and/or | |
| | B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and | |
| | CC (except Sections 725.297(c) and 725.300)? | |
| | YesNoN/A | |
| | C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and | |
| | maintained the required records identified in this subsection? | |
| | YesNoN/AX | |
| | and/or | |
| | D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? | |
| | Yes No N/A | |
| | For waste in containers, has the generator marked and made visible for inspection on each container, the date | |
| 722.134(a)(2)) | upon which accumulation began? | |
| | Not 100 %. Corrected Yes No X N/A | |
| | For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous | |
| 722.134(a)(3)) | Waste"? Not (DO) Consoled | |
| | Yes No N/A | |
| 722.134(a)(4)) | | |
| , 22.13 ((4)(1)) | Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and | |
| | 728.107(a)(4)? Yes X No N/A | |
| | 105 100 10/A | |
| | Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with | |
| | are as follows: | |
| | | |
| | Does the facility accumulate hazardous waste in containers? Yes No N/A | |
| | Yes No N/A If "No", go to Subpart J. | |
| | To the figure of the support of | |
| | SUBPART I: USE AND MANAGEMENT OF CONTAINERS | |
| | SUBSTRICT I. COLUMNIAGEMENT OF CONTAINERS | 725 211 |
| | Has the generator closed an accumulation area? | 725.211 |
| 725.211) | Yes No N/A | |
| 725.214) | If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? | 725.214 |
| | Yes No N/A | |
| 725.271) | | |
| , | If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? | |
| | YesNoN/A_X | |
| | Is the waste compatible with the container and/or liner? | |
| 725.272) | Yes No N/A | |
| | 1031010/A | |
| 725.273(a)) | Are containers of hazardous waste always closed except to remove or add waste during accumulation? | |
| | Yes No N/A | |
| 2724.5 | | |
| 5.273(b)) | Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture | |
| | of the container or prevent it from leaking? Yes X No N/A | |
| | I CS / NO N/A | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|------------------------|---|-----------|
| (725.274) | Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes No N/A Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes No N/A | |
| (725.276) | Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes | |
| (725.277) | Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_X No N/A COMMENTS: Written Inspection Seconds | |
| (725.278) | Section 725.278 Air Emission Standards Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes X No N/A Comments: | |
| | Does the generator accumulate and/or treat hazardous waste in tanks? Yes No N/A Note: If "No", go to Subpart C. | |
| (725.211) (725.214) | SUBPART J: TANK SYSTEMS Has the generator closed an accumulation area? Yes No N/A If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes No N/A | 725.211 |
| (725.290) | Does the facility accumulate or treat hazardous waste in tanks? Yes No N/A | |
| | Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. | |
| | a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart. | |

| Regulation | | RCRA GENERATOR I | NSPECTION (| CHECKLIST | (PART 722) | Violation |
|--------------|----------------------------|---|--|--|--|-----------|
| (725.291(a)) | seconda | cs existing prior to July 14, 1986 (see ary containment system, has a written nee with Section 702.126(d) by Janua | assessment been re | viewed and certifi | ed by an IRPE(*) in | |
| | | | Yes | No | N/A | |
| (725.291(b)) | Does thi | is assessment consider at least the fol design standards for the tank and ar | | | N/A | |
| | 2) | hazardous characteristics of the was | stes? | No | | |
| | 3) | existing corrosion protection measu | | | | |
| | 4) | documented age of the tank system | Yes? | | | |
| | | | Yes | No | N/A | |
| | 5) | results of a leak test, internal inspec | ction, or other tank Yes | | | |
| | | | 1 65 | INU | | |
| | *IRPE = | = Independent Registered Professiona | al Engineer | | , | |
| (725.291(c)) | | ank system assessment been performe ous waste? | d within 12 months | after the material | s in the tank become a | |
| | | | Yes | No | N/A | |
| (725.292(a)) | 07/14/8 | If an assessment indicates a tank sy with the requirements of Section 7. v tanks (see definition of new tanks u 6, has a written assessment been revieus) (d) prior to operation of the tank systems. | 25.291(b)(5). nder Section 720.1 ewed and certified | 10) whose installa | tion commenced after | |
| | | | Yes | No | N/A | |
| | Does the | e assessment include, at a minimum, design standards for tanks and anci | | | | |
| | 2) | hazardous characteristics of the was | Yesste(s) to be handled | No | N/A | |
| | | | | | | |
| | - | | Yes | No | N/A | |
| | 3) | evaluation of potential for corrosion components in contact with soil or | Yes n and corrosion pro | No | N/A for tank systems with metal | |
| | | components in contact with soil or | Yesn and corrosion provater? Yes | No tection measures No | for tank systems with metal | |
| | | components in contact with soil or design or operational measures that resulting from vehicular traffic? | Yes_n and corrosion provater? Yes_t will protect under | No_ tection measures No_ ground tank system | for tank systems with metal N/A ns from potential damage | |
| | 3) | components in contact with soil or design or operational measures that resulting from vehicular traffic? | Yes_n and corrosion provater? Yes_t will protect under | No_ tection measures No_ ground tank system | for tank systems with metal N/A ns from potential damage | |
| | 3) | components in contact with soil or design or operational measures that | Yesn and corrosion pro water? Yest will protect under Yes ions, anchoring to p | No tection measures No ground tank system No prevent flotation o | for tank systems with metal N/A ns from potential damage N/A r dislodgment and the ability | |
| | 3) | design or operational measures that resulting from vehicular traffic? designs to ensure adequate foundations. | Yesn and corrosion pro water? Yest will protect under Yes ions, anchoring to p | No | for tank systems with metal N/A ns from potential damage N/A r dislodgment and the ability | |
| (725.292(g)) | 3) 4) 5) Has the certifica | design or operational measures that resulting from vehicular traffic? designs to ensure adequate foundations. | Yes | No | N/Ans from potential damage N/A r dislodgment and the ability N/A ents, including the | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|--------------|--|-----------|
| (725.293(a)) | Is secondary containment provided for any new tank system before being put into service? Yes No N/A | |
| | Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? | |
| | Yes No N/A For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? | |
| | Yes No N/A | |
| | For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes No N/A | |
| | or | |
| | if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? | |
| | Yes No N/A | |
| | For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? | |
| | Yes No N/A | |
| (725.293(b)) | Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? | |
| | Yes No N/A | |
| | Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? | |
| | Yes No N/A | |
| (725.293(c)) | To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes | |
| | placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? | |
| | Yes No N/A 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? | |
| | Yes No N/A | |
| | 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? | |
| | Yes No N/A | |
| | is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? | |
| | Yes No N/A | |
| | Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation. | |
| (725.293(d)) | Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? | |
| | Yes No N/A | |
| (725.293(e)) | Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? | |
| | Yes No N/A | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|--------------|--|-----------|
| (725.293(f)) | Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and | |
| | (c)? Yes NoN/A | |
| | 105 | |
| | If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? | |
| | Yes No N/A 2) Are welded flanges, joints and connections inspected daily? Yes No N/A | |
| | 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes No N/A | |
| | 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? YesNoN/A | |
| 725.293(i)) | Until such time as secondary containment is provided, are the following requirements being met for all tank systems: | |
| | 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? | |
| | YesNoN/A | |
| | 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes No N/A | |
| | 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? | |
| | Yes No N/A | |
| | Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296. | |
| 725.294(a)) | Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? | |
| | Yes No N/A | |
| 725.294(b)) | Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: | |
| | 1) spill prevention controls? Yes No N/A | |
| | 2) overfill prevention controls? | |
| | Yes No N/A | |
| 705 204()) | 1 | |
| 725.294(c)) | Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296. | |
| 725.295(a)) | Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? | |
| | Yes No N/A 2) the aboveground portion of the tank system for corrosion or releases? | |
| | Yes No N/A | |
| | Yes No N/A | |
| 725.295(b)) | If the tank system has cathodic protection, is the owner/operator complying with Section 725.293(b) to ensure that they are functioning properly? | |
| | Yes No N/A | |
| | | |
| 725.295(c)) | Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|--------------|---|-----------|
| (725.296) | If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? | |
| | b) removed applicable waste from the system within 24 hours of detection? Yes No N/A c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? | |
| (725.296(d)) | d) notified the Agency within 24 hours of detection of release? | |
| | Yes No N/A d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes No N/A Note: Notification and reports are not necessary if less than I pound of material is spilled and it was immediately contained and cleaned up. | |
| (725.296(e)) | e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes | |
| | e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes No N/A e)4) met the requirements for a new tank system in the event that a component is replaced during repair? | |
| | e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? | |
| (725.296(f)) | f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the in ended life of the system? | |
| | Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297. | |
| (725.297(a)) | At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as lazardous waste [unless Section 721.103(d) applies]? | |
| | Yes No N/A | |
| (725.297(a)) | Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes No N/A | |
| (725.297(b)) | If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? | |
| | Yes No N/A | |
| | Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H. | |

| Regulation | RCRA GENERATOR INS | SPECTION (| CHECKLIST (I | PART 722) | Violation |
|-------------|--|-------------------|----------------------|-------------------------|-----------|
| 725.298(a)) | Are ignitable or reactive wastes placed in a tank | system? Yes | No | N/A | |
| | If "No", skip to Section 725.299. | 1 00 | | | - |
| • | Is the waste treated, rendered or mixed before or | | | | |
| | - the resulting waste, mixture or dissolve | Yes | | | |
| | - Section 725.117(b) is complied with? | Yes | No | N/A | |
| | or Is the waste accumulated or treated so that it is p ignition or reaction? | protected from an | ny material or condi | tions which may lead to | |
| | or | Yes | No | N/A | |
| | Is the tank used solely for emergencies? | Yes | No | N/A | |
| 25.298(b)) | Is the facility complying with the requirements i | regarding mainte | enance of protective | distances between the | |
| | waste management area and any public ways, st | Yes | | y line? N/A | |
| 25.299) | Are incompatible wastes/materials placed in the | | No | N/A | |
| | If "No", skip to Section 725.300. | | | 1 | |
| | Is Section 725.117(b) being complied with? | Yes | No | N/A | i |
| | Has the tank system been properly decontaminal Section 725.117(b) is complied with? | | | | |
| | Section (2011) (c) is complied with | Yes | No | N/A | |
| | COMMENTS: | | | | |
| | | | | | |
| | | | | | |
| 25.302) | Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous | s waste placed in | tanks in accordance | with Subparts AA, BB | |
| | and CC of Part 725? | Yes | No | N/A | |
| | Comments: | | | • | |
| | | | | | |
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| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|--------------|--|-----------|
| 5.131) | SUBPART C: PREPAREDNESS AND PREVENTION | |
| 9.131) | Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes No N/A | |
| (725.132) | Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes X No N/A | |
| | b) a telephone or other device to summon emergency assistance from local authorities? | |
| | Yes No N/A c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination | |
| | equipment? Yes No N/A d) water at adequate volume and pressure for fire control? Yes No N/A | |
| (725.133) | Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control | |
| (123.103) | equipment and decontamination equipment? Yes No N/A | |
| (725.134) | a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? | |
| | b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes No N/A | |
| (725.135) | Is the facility maintaining adequate aisle space? Yes | |
| (725.137) | Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Laz Internet Black X No | |
| | facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? On base Yes X No No N/A | |
| | SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES | |
| (725.151(a)) | Is the contingency plan available? Yes_X NoN/A | |
| | If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes | |
| (725.151(b)) | Has there been a fire, explosion or release of hazardous waste? Sweet Spiles Yes No N/A If "Yes", has the contingency plan been carried out immediately? | |
| 5 152()) | Yes No N/A Does the plan describe the actions required for response to: bld Spc / Sas e | |
| 25.152(a)) | Does the plan describe the actions required for response to: - fires? - explosions? - releases? Yes Y No X N/A N/A N/A N/A N/A | |

| Regulation | RCRA GENERATOR | INSPECTION C | HECKLIST (| PART 722) | Violation |
|-------------------------|--|-----------------------|---------------------|----------------------------|-----------|
| 725.152(c)) | Does the plan describe arrangements with: | | | | |
| (-)/ | - police and fire departments? | Yes 🗶 | No | N/A | |
| | - hospitals? | 17 🗸 | No | N/A | |
| | - contractors? | Ves Y | No | N/A | |
| | - emergency response teams? | Yes X Yes X | No No | N/A | |
| 725.152(d) | | | | home) and address? | |
| 23.132(u) | Does the plan contain the current emergency | | No_X | | X |
| /25.152(e)) | Does the plan identify all emergency equipr | nent including: | · | | |
| 201102(0)/ | - description? | Yes X | No | N/A | |
| | - capability? | Yes 🔀 | No. | N/A | |
| | | Yes X | No | N/A | |
| | - location? Is the list of emergency equipment up-to-da | | No | N/A | |
| | is the list of emergency equipment up to du | Yes | No | N/A | |
| ⁷ 25.152(f)) | Does the plan include: | | | | |
| • | - an evacuation plan? | Yes 🗙 | No | N/A | |
| | - an evacuation signal? | Yes 🗶 | No | N/A | 1 |
| | - alternate evacuation routes? | Yes X | No | N/A | |
| 725.153) | Has the contingency plan (including all revi | sions) heen: | | | |
| 123.133) | a) maintained at the facility? | Yes_X | No | N/A | |
| | b) submitted to: | 103 | No | N/A | |
| | - police department? | Yes_X_ | Ma | NI/A | 1 |
| | | | No | N/A | 1 |
| | 1 1 | Yes 🗴 | No | N/A | |
| | Rost (- hospital? | Yes X | No | N/A | 1 |
| | - emergency response teams? | Yes | No | N/A | |
| 725.154) | Has the contingency plan been reviewed and | | | | |
| | a) regulations are revised? | Yes_X | No | N/A | |
| | b) the plan fails in an emergency? | Yes | No | N/A X | |
| | c) the facility changes in a way that t | nodifies the emergeno | cy response necess | sary? | İ |
| | | Yes X | No | | |
| | d) information regarding emergency | | ? | | |
| | | Yes | No 🗙 | N/A | |
| | e) information regarding equipment | | | • ··· • <u></u> | |
| | c) information regarding equipment | Yes_X | No | N/A | |
| 725.155) | Is the emergency coordinator on-site or on o | rall at all times? | | | |
| , | is the emergency coordinator of site of oil C | Yes X | No | N/A | |
| | Is the emergency coordinator familiar with | | | | |
| | | Yes X | No | | |
| | Does the emergency coordinator have the ar | | e resources needed | to carry out the actions | |
| | specified in the contingency plan? | to commit the | | carry out the actions | |
| | Transfer of the state of the st | Yes_X | No | N/A | |
| 725.156) | If the facility has had a release, fire or explo | | | | |
| . 20, 100) | assessment, response and reporting? | onon, nave the proced | uies of this sectio | ii been tollowed regarding | |
| | assessment, response and reporting: | Yes | No | N/A X | |
| | | | 110 | 11112 | |
| | Note: If the facility has had a release, ex | plain in detail. | | | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|-------------|---|-----------|
| 725.116(a)) | Section 725.116 Personnel Training | |
| | Does the facility have a training program? | |
| | Yes No N/A | |
| | Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them | |
| | to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? | |
| | Yes No N/A | |
| | Is the program directed by a person trained in hazardous waste management procedures? | |
| | Yes No N/A | |
| | Does the program teach facility personnel hazardous waste management procedures (including contingency | |
| | plan implementation) relevant to the positions in which they are employed? | |
| | Yes 5 No N/A | |
| | Does the program cover, at a minimum: | |
| | - procedures to familiarize facility personnel with emergency procedures, emergency equipment and | |
| | emergency systems? | |
| | Yes No N/A | |
| | - procedures for using, inspecting, repairing and replacing facility emergency and monitoring | |
| | equipment? | |
| | Yes No N/A | |
| | - key parameters for automatic waste feed cut-off systems? | |
| | Yes No N/A | |
| | - communications or alarm systems? | |
| | Yes | |
| | | |
| | - response to fire or explosions? Yes | |
| | - response to groundwater contamination incidents? | |
| | | |
| | Yes No N/A No N/A shutdown of operations? | |
| | Yes No N/A | |
| | 1 es No N/A | |
| 725.116(b)) | Have new employees completed the program within 6 months of the date of employment or assignment to a | |
| . ,, | position requiring them to manage hazardous waste? | |
| | Yes | |
| | | |
| 725.116(c)) | Have facility personnel received an annual review of the initial training? | |
| | Yes No N/A | |
| | | |
| 725.116(d)) | Are the following documents and records being maintained at the facility: | |
| | 1) the job title for each position related to hazardous waste management and the name(s) of the | |
| | employee(s) filling each job? | |
| | Yes No N/A | |
| | 2) a written job description for each position above, including the requisite skill, education or other | |
| | qualifications and duties of personnel assigned to each position? | |
| | Yes No N/A | |
| | 3) a written description of the type and amount of both initial and continuing training that will be given | |
| | to each person filling a position dealing with hazardous waste management? | |
| | Yes 8 No N/A | |
| | 4) records documenting that the training or job experience has been given to and completed by facility | |
| | personnel? | |
| | Yes | • |
| 705 116/->> | | |
| 725.116(e)) | Is the facility maintaining training records until closure of the facility and those of former employees for at | |
| | least 3 years from the last date of employment? | |
| | Yes X No_ N/A | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|--------------|--|------------|
| 3.107(a)(5)) | Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? | |
| | Yes No N/A | |
| | Is the plan on-site? | |
| | Yes No N/A Does the plan include a detailed physical and chemical analysis? Yes No N/A | |
| | Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? | |
| | Yes No N/A Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? | |
| | Yes No N/A | |
| 722.134(c) | Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? | |
| | Yes No N/A Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? | |
| | Yes No N/A If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes No N/A | |
| | Ves No N/A | |
| 722.134(g) | Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled. SUBPART D: RECORDKEEPING AND REPORTING | |
| 722.140(a) | Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? | |
| : | Yes No N/A | 722.140(a) |
| 722.140(b) | Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? | |
| | Yes No N/A | 722.140(b) |
| 722.140(c) | Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? | |
| | Yes No N/A | 722.140(c) |
| 722.140(d) | Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? | |
| | Yes No N/A | 722.140(d) |
| 722.141(a) | Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? | |
| | Yes No N/A | 722.141(a) |
| | Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section. | (, |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---------------|---|---------------|
| 722.141(b) | Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes No N/A | |
| 722.142(a)(1) | Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? | 722.141(b) |
| 722.142(a)(2) | Yes No N/AX If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? | 722.142(a)(1) |
| 722.143 | Yes No N/A X Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? | 722.142(a)(2) |
| | Yes No N/A SUBPART E: EXPORTS OF HAZARDOUS WASTE | 722.143 |
| 722.150 | Is the generator an exporter of hazardous waste? Yes No N/A If "Yes", has the generator complied with the requirements of Subpart E? Yes No N/A N/A Yes No N/A | 722.150 |
| 722.160 | SUBPART F: IMPORTS OF HAZARDOUS WASTE | |
| | Yes No N/A If "Yes", has the generator complied with the requirements of Subpart F? Yes No N/A Yes No N/A | 722.160 |
| 722.170 | Is the generator a farmer? Yes No N/A If "Yes", has the generator complied with the requirements of Subpart G? Yes No N/A N/A | 722.170 |
| | COMMENTS: | |
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| | | |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|---|-------------------|
| | PART 739: STANDARDS FOR THE MANAGEMENT OF USED OIL | |
| | SUBPART B: APPLICABILITY | |
| | Note: Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b). | |
| 739.112(a) | Section 739.112 Prohibitions a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 | |
| ,,,,,, | or 725? Yes No N/A | 739.112(a) |
| 739.112(b) | b) Is used oil being used as a dust suppressant? Yes No N/A | 739.112(b) |
| 739.112(c) | c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, | |
| | utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes No N/A | 739.112(c) |
| | SUBPART C: STANDARDS FOR USED OIL GENERATORS | |
| 739.121(a) | Section 739.121 Hazardous Waste Mixing Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes No N/A | 739.121(a) |
| 739.121(b) | If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as | |
| | a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes No N/A | 739.121(b) |
| 739.122(a) | Section 739.122 Used Oil Storage Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or | 700 100 () |
| | 725? Yes No N/A | 739.122(a) |
| 739.122(b) | Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? | |
| : | Yes | 739.122(b) |
| 739.122(c) | Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? Yes | 739.122(c) |
| 739.122(d) | Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and | |
| | 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? | 739.122(d) |
| | Yes No X N/A | * |
| 739.123(a) | Section 739.123 On-Site Burning in Space Heaters Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from | |
| | household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes | 739.123(a) |
| | Section 739.124 Off-Site Shipments | |
| 739.124 | Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to | |
| | Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? Yes | 739.124 |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|---|------------|
| | SUBPART D: STANDARDS FOR USED OIL COLLECTION CENTERS | |
| 130(b) | Section 739.130 Do-It-Yourselfer (DIY) Used Oil Collection Centers Does the DIY collection center comply with the generator standards in Subpart C of Part 739? Yes NoN/A | 739.130(b) |
| 39.131(b) | Section 739.131 Used Oil Collection Centers Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes No N/A | 739.131(b) |
| 39.132(b) | Section 739.132 Used Oil Aggregation Points Owned by the Generator Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? | 739.132(b) |
| 39.141(a) | SUBPART E: STANDARDS FOR USED OIL TRANSPORTER AND TRANSFER FACILITIES | |
| | Section 739.141 Restrictions on transporters who are not also processors Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? | 739.141(a) |
| | Yes No N/A | |
| 39.141(b) | Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? Yes No N/A | 739.141(b) |
| 39.142(a) | Section 739.142 Notification Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes No N/A | 739.142(a) |
| 39.143(a) | Section 739.143 Used Oil Transportation Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facility that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? Yes No N/A | 739.143(a) |
| 39.143(b) | Has the used oil transporter complied with all applicable packaging and labeling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180? | 739.143(b) |
| 39.143(c) | Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? Yes No N/A | 739.143(c) |
| 9.144(a) | Section 739.144 Rebuttable Presumption Has the used oil transporter determined whether the total halogen content of the used oil transported or stored at a transfer facility is above or below 1000 ppm? Yes No N/A | 739.144(a) |
| 9.144(d) | Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? | |
| | Yes No N/A | 739.144(d) |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|--|------------|
| 739.145 | Section 739.145 Used Oil Storage at Transfer Stations Has the owner/operator of a used oil transfer facility: b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes No N/A | 739.145 |
| | h) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other material; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes | |
| 739.146(a) | Section 739.146 Tracking Has the used oil transporter kept a record of each used oil shipment that includes: 1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and 2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and 3) the quantity of used oil accepted; and 4) the date accepted; and 5) the signature of a representative of the GTP that provided the used oil? Yes | 739.146(a) |
| 739.146(b) | Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes: 1) the name and address of the receiving facility or transporter: and 2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and 3) the quantity of used oil delivered; and 4) the date of delivery; and 5) the signature of a representative of the receiving facility or transporter? Yes | 739.146(b) |
| 739.146(c) | Has the used oil transporter who exports used oil to a foreign country complied with this subsection Yes No N/A | 739.146(c) |
| 739.146(d) | Has the used oil transporter retained all records required under this Section for at least 3 years? Yes No N/A | 739.146(d) |
| 739.147 | Section 739.147 Management of Residues Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110? Yes | 739.147 |
| 739.151 | SUBPART F: STANDARDS FOR USED OIL PROCESSORS | |
| | Section 739.151 Notification Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes No N/A | 739.151 |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|---|---|
| 739.152(a) | Section 739.152 General Facility Standards Has the owner/operator of a used oil processor and refiner: 1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and 2) ensured that he is equipped with the equipment required in this Subsection; and | |
| | tested and maintained equipment as required; and maintained access to communication or alarm system(s); and maintained the required aisle space; and maintained arrangements with local authorities? Yes | 739.152(a) |
| 739.152(b) | Has the owner/operator of a used oil processing and refining facility complied with the following requirements: 1) developed a contingency plan; and 2) ensured that the contingency plan complies with the requirements of this Section; and 3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and 4) amended the contingency plan as applicable to this Subsection; and | |
| | 5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and 6) ensured that emergency procedures meet the requirements of this Subsection? Yes No N/A | 739.152(b) |
| 739.153 | Section 739.153 Rebuttable Presumption Has the used oil processor determined whether the total halogen content of the used oil being transported or | |
| | stored at a transfer facility is above or below 1000 ppm? Yes No N/A | 739.153 |
| 739.154(a) | Section 739.154 Used Oil Management Has the owner/operator of a used oil processor: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes No N/A | 739.154(a) |
| 739.154(b) | b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks? Yes No N/A | 739.154(b) |
| 739.154(c) | c) provided secondary containment for containers as required by this Subsection? Yes No N/A | 739.154(c) |
| 739.154(d) | d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes No N/A | 739.154(d) |
| 739.154(e) | e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes No N/A | 739.154(e) |
| 739.154(f) | f) labeled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? | 739.154(f) |
| 739.154(g) | yes No N/A | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| | 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? YesNoN/A | 739.154(g) |
| 739.154(h) | h) closed aboveground tanks and containers in accordance with this Section? Yes No N/A | 739.154(h) |
| .155 | Section 739.155 Analysis Plan Has the owner/operator of a used oil processing and re-refining facility developed kent on-site and followed a | |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
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| | written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? | 739.155 |
| | Yes No N/A | |
| 739.156 | Section 739.156 Tracking Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and the name and address of the generator or processor from whom the used oil was sent for processing; and | |
| | 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? | 739.156 |
| | Yes No N/A | |
| 739.156(b) | Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal | |
| | facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and | 739.156(b) |
| | 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and | /39.130(b) |
| | 6) the date of shipment? Yes No N/A | |
| 739.156(c) | Have the records described in this Section been maintained for at least 3 years? Yes No N/A | 739.156(c) |
| 739.157(a) | Section 739.157 Operating Record and Reporting Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section | |
| | 739.155? - summary reports and details of all incidents that require implementation of the contingercy plan as specified in Section 739.152(b)? | 739.157(a) |
| | Yes No N/A | |
| 739.157(b) | Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor: and 2) the calendar year covered by the report; and | |
| | 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? | 739.157(b) |
| | Yes No N/A | |
| 739.158 | Section 739.158 Off-Site Shipments of Used Oil Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? | 739.158 |
| | Yes No N/A | ,57,150 |
| 739.159 | Section 739.159 Management of Residue Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? | |
| | Yes No N/A | 739.159 |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|--|------------|
| 739.161 | SUBPART G: STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY Section 739.161 Restriction on Burning | |
| | Is off-spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste | 739.161 |
| | incinerators? Yes No N/A | |
| 739.162 | Section 739.162 Notification Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? | 739.162 |
| | Yes No N/A | |
| 739.163(a) | Section 739.163 Rebuttable Presumption for Used Oil Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? | |
| | Yes No N/A | 739.163(a) |
| 739.163(d) | Has the used oil burner retained all records of analyses and information used to comply with this section for at least 3 years? | |
| | Yes No N/A | 739.163(d) |
| 739.164(a) | Section 739.164 Used Oil Storage Has the owner/operator of a used oil burning facility: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? | |
| | Yes No N/A | 739.164(a) |
| 739.164(b) | b) used only containers and aboveground tanks that are in good condition, with no visible leaks, o store used oil? | |
| | Yes No N/A | 739.164(b) |
| 739.164(c) | c) provided secondary containment for containers as required by this Subsection? | |
| , | Yes No N/A | 739.164(c) |
| 739.164(d) | d) provided secondary containment for existing aboveground tanks as required by this Subsection? | |
| , , | Yes No N/A | 739.164(d) |
| 739.164(e) | e) provided secondary containment for new aboveground tanks as required by this Subsection? | |
| | Yes No N/A | 739.164(e) |
| 739.164(f) | f) labeled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? | |
| | Yes No N/A | 739.164(f) |
| 739.164(g) | g) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and | |
| | 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A | 739.164(g) |
| 739.165(a) | Section 739.165 Tracking Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice manifest, bill of lading or other) that includes: | |
| | the name and address of the transporter who delivered the used oil to the burner; and the name and address of the generator or processor from whom the used oil was sent to the burner; | |
| | and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and 5) the quantity of used oil accepted; and 6) the data of acceptance? | 739.165(a) |
| | 6) the date of acceptance? Yes No N/A | |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|---|-------------|
| 739.165(b) | Have the records described in this Section been maintained on-site for at least 3 years? Yes No N/A | 739.165(b) |
| 739.166(a) | Section 739.166 Notice Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: 1) the burner has notified the Agency stating the location and general description of the used oil management activities; and 2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)? | 739.166(a) |
| | Yes No N/A | |
| 739.166(b) | Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? | 739.166(b) |
| | Yes No N/A | |
| 739.167 | Section 739.167 Management of Residue Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? | 739.167 |
| | Yes No N/A | 737.107 |
| 739.171 | SUBPART H: STANDARDS FOR USED OIL FUEL MARKETERS | |
| | Section 739.171 Prohibitions Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? | 739.171 |
| | Yes No N/A | |
| 739.172(b) | Section 739.172 On-Spec Used Oil Fuel Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept | |
| | copies of analyses or other information for at least 3 years? Yes No N/A | 739.172(b) |
| 739.173(a) | Section 739.173 Notification Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an | |
| | IEPA special waste ID #? Yes No N/A | 739.173(a) |
| 739.174(a) | Section 739.174 Tracking Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the burner who will receive the used oil; and | • |
| | 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID # of the burner; and 5) the quantity of used oil shipped; and 6) the date of acceptance? | 739.174(a) |
| | Yes No N/A | |
| 739.174(b) | Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and | |
| | 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes No N/A | 739.174(b) |
| 174(c) | Have the records described in this Section been maintained on-site for at least 3 years? | |
| | Yes_ No N/A | 739.174(c) |

| Regulation | RCRA USED OIL INSPECTION CHECKLIST (PART 739) | Violation |
|------------|---|------------|
| 175(a) | Section 739.175 Notices Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that: 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes No N/A COMMENTS: | 739.175(a) |

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| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |
|--------------|--|---------------|
| | PART 733: STANDARDS FOR UNIVERSAL WASTE MANAGEMENT | |
| | SUBPART A: GENERAL | |
| 33.101 | Section 733.101 Scope Note: This Part provides an alternative set of management standards for batteries (Section 733.102), pesticides (Section 733.103), thermostats (Section 733.104), and lamps (Section 733.105), in lieu of regulation under 35 III. Adm. Code 702 through 705, 720 through 726, and 728. | |
| | Note: Pursuant to Section 733.105, persons managing household hazardous wastes, exempt under subsection 724.104(b)(1), or conditionally exempt small quantity generator wastes, exempt under Section 721.105(g), and are of the same type as universal wastes defined in Section 733.106, may, at their option, manage them under the requirements of this Part. | |
| 33.102 | Section 733.102 Applicability Batteries Note: Spent lead-acid batteries that are managed under Part 726, Subpart G, are not covered under this Part. Generators of batteries as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part. | |
| • | Section 733.103 Applicability Pesticides Note: Pesticides covered under this Part include: 1) recalled stocks of a suspended and canceled pesticide as part of a voluntary or mandatory recall under Section 19(b) of FIFRA; or 2) recalled stocks of a suspended and canceled pesticide as part of a voluntary recall by the registrant for a pesticide not in compliance with FIFRA; or 3) stocks of other unused pesticide products that are collected and managed as part of a waste pesticide collection program. | |
| | Pesticides not covered under this Part include recalled or unused pesticides that are managed by farmers in compliance with Section 722.170. Section 733.104 Applicability Mercury Thermostats | |
| 233.104 | Note: Generators of mercury thermostats as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part. | |
| 733.105 | Section 733.105 Applicability Lamps Note: Generators of lamps as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part. | |
| | SUBPART B: STANDARDS FOR SMALL QUANTITY GENERATORS | |
| 33.111(a) | Section 733.111 Prohibitions Has the small quantity handler refrained from disposing of universal waste? Yes No N/A | |
| 33.111(b) | Has the small quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.117) or managing specific wastes (Section 733.113)? Yes No N/A | 733.111(a) |
| | | 733.111(b) |
| 733.112 | Section 733.112 Notification Note: A small quantity handler of universal waste means a universal waste handler that does not accumulate 5,000 kilograms or more of universal waste at any time. A small quantity handler of universal waste is not required to notify the Agency of its universal waste handling activities. | |
| 33.113(a)(1) | Section 733.113 Waste Management Has the small quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? No aridence of leakage, spillage, No | 733.113(a)(1) |
| 23.113(a)(2) | Has each battery cell remained intact and closed while the small quantity handler conducted the activities listed in subsection 733.113(a)(2) (except to remove electrolyte; but must be immediately closed after | |

| | 1 Count of | Yes | | No | N/A X | |
|---------------|------------|--|-----------------------------------|---|--|---------------|
| | ļ | | | | \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\ | 733.113(a)(3) |
| | Note: | If the electrolyte or other solid waste is a char regulation under 35 III. Adm. Code 702 through | | | | |
| 733.113(b) | | universal waste pesticide(s) been contained in a the requirements of Part 725, Subpart J (excep | | | | i |
| | | a way that prevents releases to the environment | nt? | | | 733.113(b) |
| | | Yes_ | | No | N/A | |
| 733.113(c)(1) | | small quantity handler contained any universal spillage, or damage in a proper container? | waste mercury | thermostat that sh | ows evidence of | · |
| | lcakage, | Yes_ | 1 | No | N/A | 733.113(c)(1) |
| 733.113(c)(2) | Has the | small quantity handler followed each of the pro | ocedures identi | fied in subsection 7 | 733.113(c)(2) when | |
| | removin | g mercury-containing ampules form universal | waste thermost | ats? | , - | 733.113(c)(2) |
| | | Yes_ | | No | N/A | /55.115(0)(2) |
| 733.113(c)(3) | that gen | small quantity handler that removes mercury-corates other solid waste as a result of the removation for mercury or clean-up residues resulting | al of the ampu g from spills o | les made a proper l r leaks or other sol | nazardous waste id waste generated? | |
| | | Yes_ | | No | N/A X | 733.113(c)(3) |
| | Note: | If the mercury, residues, or other solid waste | is a characteris | tic hazardous wast | e. it is subject to full | |
| | | regulation under 35 Ill. Adm. Code 702 throu | | | | |
| 733.113(d) | Has the | small quantity handler of lamps managed then vs: | n in a manner t | hat prevents releas | es to the environment | |
| 733.113(d)(1) | | ed all lamps in containers or packages that are | | | | 733.113(d)(1) |
| | | ble with the contents of the lamps, and kept su- spillage, or damage that could cause leakage t | | | | 755.115(d)(1) |
| | | | | No <u>X</u> | | X |
| 733.113(d)(2) | | itely cleaned up and contained any lamp that is | | • | | |
| | evidenc | of breakage, leakage, or damage that could ca Yes _ | nuse a release o | f hazardous constit | nuents. N/A X | 733.113(d)(2) |
| 733.113(d)(3) | trea | ted (by crushing) those lamps only under the fo | ollowing condi | tions: | - | 733.113(d)(3) |
| | | | | - | | ,551115(2)(0) |
| | A) | in a closed system where emission of mercury weighted average over an 8-hour period? | y does not exce | ed 0.1mg/m² on the | e basis of time | |
| | | | | No | N/A 🗶 | : |
| | B) | submitted Agency notification of crushing ac | tivity anarterly | 9 | | |
| | } | | | No | N/A × | |
| | C) | immediately transferred any material recover | | or leak to a proper | container and have | |
| | | available equipment necessary to recover suc Yes | h material? | No | N/A X | |
| | | | | | | |
| | (U | ensures that the crushing area is well ventilate levels? | | - | | |
| | | Yes_ | | No | N/A | |
| | E) | mercury waste? | | | 1 | |
| | | Yes_ | | No | N/A | |
| | F) | crushed lamps are stored in closed non-leakir | ng containers th | at are in good con- | lition? | |
| | -/ | | | No | N/A X | |

| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |
|------------|--|------------|
| 114(a) | Section 733.114 Labeling and Marking Does the small quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used | 733.114(a) |
| | Battery(ies)"? YesX No N/A | · |
| 733.114(b) | Does the small quantity handler of <u>recalled</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? | 733.114(b) |
| | Yes No N/A | 755.114(0) |
| 733.114(c) | Does the small quantity handler of <u>unused</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the | 722 114(-) |
| | words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes No N/A | 733.114(c) |
| 733.114(d) | Does the small quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury | |
| | Thermostat(s)", or "Used Mercury Thermostat(s)"? Yes No N/A | 733.114(d) |
| 733.114(e) | Does the small quantity handler of universal waste lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"? | 722 114 |
| | one container not maked on Yes No_x N/A | 733.114(e) |
| 733.115(a) | Section 733.115 Accumulation Time Limits Does a small quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.115(b) are met? | 733.115(a) |
| | Yes No N/A | 755.115(a) |
| 733.115(b) | A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. | 722 115(1) |
| | The handler bears the burden of proof for such activity. Yes No N/AX | 733.115(b) |
| 733.115(c) | Does the small quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection? | 733.115(c) |
| | Yes No N/A | 7551715(0) |
| 733.116 | Section 733.116 Employee Training Has the small quantity handler of universal waste informed all employees handling or managing universal waste of proper and appropriate handling and emergency procedures? | 733.116 |
| | Yes No N/A | /33.110 |
| 733.117(a) | Section 733.117 Response to Releases Has the small quantity handler of universal waste immediately contained all releases and residues? | |
| | Yes No N/AX | 733.117(a) |
| 733.117(b) | Has the small quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728? | 733.117(b) |
| | Yes No N/A | 755.117(0) |
| 733.118(a) | Section 733.118 Off-Site Shipments Does the small quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? | 722 119(a) |
| | Yes No N/A | 733.118(a) |
| 118(b) | If a small quantity handler of universal waste self-transports universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? | 733.118(b) |
| | Yes No N/AX | (33.118(0) |

| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |
|------------|---|--------------------|
| 733.118(c) | Has the small quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT | |
| | regulations (49 CFR 172 through 180)? | 733.118(c) |
| | Yes No N/A | |
| 733.118(d) | Does the originating small quantity universal waste handler ensure, prior to shipment, that the receiving | |
| | handler agrees to receive the shipment? Yes No N/A | 733.118(d) |
| 733.118(e) | Does the small quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination | |
| | facility to which the shipment will be sent? Yes No N/A | 733.118(e) |
| 733.118(f) | If the small quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the | 722 118(5) |
| | originating handler or sent the shipment to an agreed upon destination facility? Yes No N/A | 733.118(f) |
| 733.118(g) | If the small quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from | |
| | the Agency for managing the hazardous waste? | 733.118(g) |
| | Yes No N/AX | |
| 733.118(h) | If the small quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, | |
| | has the handler managed the waste in compliance with applicable solid waste regulation? Yes No N/A | 733.118(h) |
| 733.119 | Section 733.119 Tracking Universal Waste Shipments Note: A small quantity handler of universal waste is not required to keep records of shipments of universal waste. Section 733.120 Exports | |
| 733.120 | Has the small quantity handler of universal waste complied with this section for all exports of universal waste? | 733.120 |
| | Yes No N/A | /33.120 |
| | SUBPART C: STANDARDS FOR LARGE QUANTITY HANDLERS | |
| 733.131(a) | Section 733.131 Prohibitions Has the large quantity handler refrained from disposing of universal waste? Yes No N/A | |
| | <u> </u> | 733.131(a) |
| 733.131(b) | Has the large quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.137) or managing specific wastes (Section 733.133)? | |
| | Yes No N/A | 733.131(b) |
| 733.132(a) | Section 733.132 Notification Has the large quantity handler of universal waste sent a written notification of universal waste management to the Agency and received a USEPA Identification Number before meeting or exceeding the 5000 kilogram storage limit? | |
| | Yes No N/A | 733.132(a) |
| | Note: A large quantity handler that has already notified the USEPA or Agency of its hazardous waste management activities and received a USEPA Identification Number is not required to renotify. | |
| | Note: A large quantity handler of recalled universal waste pesticides that has sent notification to USEPA or the Agency, as required by 40 CFR 165, is not required to renotify. | |
| 32(b) | Does the notification submitted by the large quantity handler of universal waste include the information listed under subsections 733.132(b)(1) through (b)(5)? | 7 22 - 72 7 |
| _ | Yes No N/A | 733.132(b) |

| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |
|---------------|--|---------------|
| 733.133(a)(1) | Section 733.133 Waste Management Has the large quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes No N/A | 733.133(a)(1) |
| 733.133(a)(2) | Has each battery cell remained intact and closed while the large quantity handler conducted the activities listed in subsection 733.133(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes No N/A | 733.133(a)(2) |
| 733.133(a)(3) | Has the large quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.133(a)(2) made a proper hazardous waste determination? Yes No N/A | |
| | Note: If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728. | 733.133(a)(3) |
| 733.133(b) | Has the universal waste pesticide(s) been contained in a closed container, an over packed container a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c), 725.300, and 725.301) or a transport vehicle or vessel in a way that prevents releases to the environment? | 733.133(b) |
| 733.133(c)(1) | Yes No N/A Has the large quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container? | 733.133(c)(1) |
| 733.133(c)(2) | Yes No N/A Has the large quantity handler followed each of the procedures identified in subsection 733.133(c)(2) when removing mercury-containing ampules from universal waste thermostats? | 733.133(c)(2) |
| 733.133(c)(3) | Has the large quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated? | /33.133(U)(Z) |
| | Note: If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728. | 733.133(c)(3) |
| 733.133(d) | Has the large quantity handler of lamps managed them in a manner that prevents releases to the environment as follows: | |
| 733.133(d)(1) | Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? Yes No N/A | 733.133(d)(1) |
| 733.133(d)(2) | Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents. Yes No N/A | 733.133(d)(2) |
| 733.133(d)(3) | treated (by crushing) those lamps only under the following conditions: | 733.133(d)(3) |
| | A) in a closed system where emission of mercury does not exceed 0.1 mg/m³ on the basis of time weighted average over an 8-hour period? Yes No N/A | |
| | B) submitted Agency notification of crushing activity quarterly? Yes No N/A | |
| | C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes No N/A | |
| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |

| | D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury | |
|------------|---|------------|
| i | levels? Yes No N/A | |
| | | |
| | E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? | i |
| | Yes No N/A | |
| | F) crushed lamps are stored in closed non-leaking containers that are in good condition? Yes No N/A | |
| | Section 733.134 Labeling and Marking | |
| 733.134(a) | Does the large quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? | 733.134(a) |
| | Yes No N/A | |
| 733.134(b) | Does the large quantity handler of <u>recalled</u> universal waste pesticides label or mark each container package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal | |
| | Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes No N/A | 733.134(b) |
| 722 124(a) | Does the large quantity handler of <u>unused</u> universal waste pesticides label or mark each container/package, | |
| 733.134(c) | tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate | |
| | USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)"? | 733.134(c) |
| | Yes No N/A | |
| 733.134(d) | Does the large quantity handler of universal waste thermostats label or mark each thermostat or container of | |
| | thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"? | 733.134(d) |
| | Yes No N/A | 755.154(4) |
| 733.134(e) | Does the large quantity handler of universal waste mercury containing lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used | |
| | Lamp(s)"? Yes: No: N/A: | 733.134(e) |
| | | |
| 733.135(a) | Section 733.135 Accumulation Time Limits Does a large quantity handler of universal waste accumulate the waste for no longer than one year from the | _ |
| | date it was generated or received unless the requirements of subsection 733.135(b) are met? Yes No N/A | 733.135(a) |
| | \ | : |
| 733.135(b) | A large quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. | |
| | The handler bears the burden of proof for such activity. | 733.135(b) |
| | Yes No N/A Does the large quantity handler of universal waste demonstrate the length of accumulation time from the date | ! |
| 733.135(c) | it becomes a waste or is received in accordance with this subsection? | |
| | Yes No N/A | 733.135(c) |
| 733.136 | Section 733.136 Employee Training Has the large quantity handler of universal waste ensured that all employees (relative to their responsibilities) | |
| | are thoroughly familiar with proper universal waste handling and emergency procedures? | 733.136 |
| | Yes No N/A Section 733.137 Response to Releases | |
| 733.137(a) | Has the large quantity handler of universal waste immediately contained all releases and residues? | |
| , , | Yes No N/A | 733.137(a) |
| 733.137(b) | Has the large quantity handler of universal waste made a hazardous waste determination of material resulting | |
| ` ' | from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 lll. Adm. Code 702 through 705, 720 through 726, and 728? | 733.137(b) |
| | Yes No N/A | |
| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |

| 733.138(a) | Section 733.138 Off-Site Shipments | |
|---|--|---------------|
| 733.138(4) | Does the large quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? | 733.138(a) |
| | Yes No N/A | |
| 38(b) | If a large quantity handler of universal waste self-transports universal waste off-site, is it done so only in | |
| | compliance with the transporter requirements of Subpart D (Part 733)? Yes No N/A | 733.138(b) |
| | NONA | ľ |
| 733.138(c) | Has the large quantity universal waste handler only offered universal waste (that is a USDOT hazardous | |
| | material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? | 733.138(c) |
| | Yes No N/A | · |
| 733.138(d) | Does the originating large quantity universal waste handler ensure, prior to shipment, that the receiving | |
| | handler agrees to receive the shipment? | 733.138(d) |
| | Yes No N/A | , , |
| 733.138(e) | Does the large quantity handler of universal waste whose shipment of universal waste is rejected by the | |
| | receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? | 733.138(e) |
| | Yes No N/A | , 55,155(5) |
| 733.138(f) | If the large quantity handler of universal waste has rejected a shipment of universal waste from another | |
| ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | handler, have they notified the originating handler of the rejection and either sent the shipment back to the | |
| | originating handler or sent the shipment to an agreed upon destination facility? Yes No N/A | 733.138(f) |
| | 1 | |
| 733.138(g) | If the large quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the | |
| | Agency for managing the hazardous waste? | 733.138(g) |
| | Yes No N/A | |
| 733.138(h) | If the large quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, | |
| | has the handler managed the waste in compliance with applicable solid waste regulation? | 733.138(h) |
| | Yes No N/A | |
| 733.139(a) | Section 733.139 Tracking Universal Waste Shipments | |
| | Does the large quantity handler keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler sname and address, the quantity of each type of universal | 722 120(-) |
| | waste received, and the date of receipt of the universal waste? | 733.139(a) |
| | Yes No N/A | |
| 733.139(b) | Does the large quantity handler keep a record of each shipment of universal waste sent from the handler to | |
| | other facilities that includes the originating universal waste handler□s name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? | |
| | Yes No N/A | 733.139(b) |
| | Note: The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document. | |
| 722 120(-)(1) | | |
| 733.139(c)(1) | Has the large quantity handler retained the required records for at least three years from the date of each shipment of universal waste? | 522.120(.)(1) |
| | Yes No N/A | 733.139(c)(1) |
| 733.139(c)(2) | Has the large quantity handler retained the required records for at least three years from the date each | , |
| | shipment of universal waste left the facility? | 733.139(c)(2) |
| | Yes No N/A | . /, / |
| 722.140 | Section 733.140 Exports | |
| 733.140 | Has the large quantity handler of universal waste complied with this section for all exports of universal waste? | 722 140 |
| | Yes No N/A | 733.140 |
| | | **** |
| egulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |

| | SUBPART D: STANDARDS FOR UNIVERSAL WASTE TRANSPORTERS | |
|---------------|--|---------------|
| 733.151(a)(1) | Section 733.151 Prohibitions Has the universal waste transporter refrained from disposing of universal waste? Yes No N/A | 733.151(a)(1) |
| 733.151(a)(2) | Has the universal waste transporter refrained from diluting or treating universal waste, except by tesponding to releases (Section 733.154) or as provided in subsection 733.151(b)? Yes No N/A | 733.151(a)(2) |
| 733.151(b) | Has the transporter of universal waste mercury containing lamps treated (by crushing) the lamps only under the following conditions: | 733.151(b) |
| 733.151(b)(1) | in a closed system where emission of mercury does not exceed 0.1mg/m³ on the basis of time weighted average over an 8-hour period? Yes No N/A | |
| 733.151(b)(2) | submitted Agency notification of crushing activity quarterly? Yes No N/A | |
| 733.151(b)(3) | immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes No N/A | |
| 733.151(b)(4) | ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levds? Yes No N/A | |
| 733.151(b)(5) | ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes No N/A | |
| 733.151(b)(6) | crushed lamps are stored in closed non-leaking containers that are in good condition? Yes No N/A | |
| 733.152 | Section 733.152 Waste Management Has the universal waste transporter complied with all applicable USDOT regulations in 49 CFR 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 71.8? Yes No N/A | 733.152 |
| 733.153(a) | Section 733.153 Accumulation Time Limits Has the universal waste transporter only stored universal waste at a universal waste transfer facility for ten days or less? Yes No N/A | |
| · | Note: If a universal waste transporter stores universal waste for more than ten days, the transporter becomes a universal waste handler and shall comply with Subparts B or C while sorting the universal waste. | 733.153(a) |
| 733.154(a) | Section 733.154 Response to Releases Has the universal waste transporter immediately contained all releases and residues? Yes No N/A | 733.154(a) |
| 733.154(b) | Has the universal waste transporter made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 III. Adm. Code Parts 702 through 705, 720 through 726, and 728? | |
| | Note: If the waste is determined to be a hazardous waste, the transporter is subject to 35 III. Adm. Code Part 722. | 733.154(b) |
| Regulation | RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733) | Violation |

| 733.155(a) | Section 733.155 Off-Site Shipments Does the universal waste transporter only send or take universal waste to another universal waste handler, a | |
|------------|---|------------|
| | destination facility, or a foreign destination? | 733.155(a) |
| | Yes No N/A | |
| ,5(b) | If the universal waste transporter ships off-site hazardous material as defined under 49 CFR 171.8, has the shipment been properly described on the shipping paper in accordance with 49 CFR Part 172 (USDOT | 722 155(b) |
| | regulations)? Yes No N/A | 733.155(b) |
| 733.156 | Section 733.156 Exports Has the universal waste transporter complied with this section for all exports of universal waste? Yes No N/A | 733.156 |
| | | |
| | SUBPART E: STANDARDS FOR DESTINATION FACILITIES | |
| 733.160 | Section 733.160 Applicability Note: The owner or operator of a destination facility is subject to all applicable requirements of Parts 702 through 705, 720 through 726, and 728, and the notification requirement under Section 3010 of RCRA. However, a destination facility that recycles a universal waste without storing that waste before it is recycled shall comply with Section 721.106(c)(2). | |
| 733.161(a) | Section 733.161 Off-Site Shipments Does destination facility only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? | 733.161(a) |
| | Yes No N/A | /33.101(a) |
| 733.161(b) | If the destination facility has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the | |
| | shipment to an agreed upon destination facility? Yes No N/A | 733.161(b) |
| 733.161(c) | If the destination facility has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for | |
| | managing the hazardous waste? Yes No N/A | 733.161(c) |
| 733.161(d) | If the destination facility receives a shipment of non-hazardous, non-universal waste, has the facility managed the waste in compliance with applicable solid waste regulation? | |
| | Yes No N/A | 733.161(d) |
| 733.162(a) | Section 733.162 Tracking Universal Waste Shipments Does the destination facility keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler sname and address, the quantity of each type of universal | 722 1/2(2) |
| | waste received, and the date of receipt of the universal waste? Yes No N/A | 733.162(a) |
| 733.162(b) | Does the destination facility retain the records described in subsection (a) above for at least three years from the date of receipt of each shipment? | |
| | Yes No N/A | 733.162(b) |
| | SUBPART F: IMPORT REQUIREMENTS | |
| 733.170 | Section 733.170 Imports | |
| | Have persons managing universal waste that is imported from a foreign country complied with the applicable requirements of Part 733 immediately after the waste enters the US? | 733.170 |
| | Yes No N/A | |



United States Environmental Protection Agency

UNDERGROUND STORAGE TANK INSPECTION AND SPILL PREVENTION CONTAINMENT AND COUNTER MEASURES (SPCC) REVIEW OF SCOTT AIR FORCE BASE SCOTT AIR FORCE BASE, ILLINOIS 62225

Conducted

July 21 and 22, 2009

by

Arturo Cisneros

United States Environmental Protection Agency Region 5 (Mail Code: LR-8J) RCRA Programs Section Land and Chemicals Division 77 West Jackson Boulevard Chicago, Illinois 60604

TRIP REPORT

UST FACILITY IDENTIFICATION

Facility Name and Address

Scott Air Force Base 375th CES/CEV 701 Hanger 107 Losey St. Scott AFB, Illinois 62225

Facility Representatives

Mr. Jim Bergmann Environmental Engineer 618/256-3452

Ms. Carla Daggit, PE Environmental Engineer 618/256-2531

DATE OF INSPECTIONS:

July 21-22, 2009

PARTICIPANTS:

Arturo Cisneros, USEPA, Region 5, UST, Enforcement Officer

BACKGROUND:

On June 21, 2009, United Stated Environmental Protection Agency, Region 5 (EPA), Underground Storage Tank (UST) Section traveled to O'Fallon, Illinois to participate in a multimedia inspection at Scott Air Force Base (Scott AFB) located near Belleville and O'Fallon, Illinois.

The purpose of the inspections was to conduct operational and compliance examinations at federal facilities that have not been inspected recently by either the State or EPA. Prior to the inspections, I obtained a "compliance summary" report from the Illinois Office of the State Fire Marshal. The report provided background information on the USTs from the State's last inspection on December 09, 2008.

I met with other EPA and Illinois EPA inspectors at a nearby hotel and arrived at the facility on the morning of July 21, 20091, where an opening conference took place with U.S. Air Force representatives and staff. Members of the inspection team explained that the inspections were being conducted as part of the Federal Facilities Multimedia Inspection directive and discussed

the logistics of the inspections. I met with Mr. Jim Bergmann and Ms. Carla Daggit, who were responsible for overseeing the UST portion of the inspection

This report summarizes the UST findings at this one facility, Scott AFB. The facility is a United States government installation. Because of security issues, all photographs taken were shown and cleared by either Mr. Bergmann or Ms. Daggit. However, because the digital camera was new, the date/time settings were not properly set (i.e., 12 hour discrepancy). Most of the photos do not reflect the correct date or time. Where appropriate, the correct date and time will be listed in the narrative beneath the photo. The inspection findings are as follows:

FINDINGS:

Building 750

Two 8,000 gallon USTs, containing diesel, are located by building number 750. The USTs are solely used to store fuel for emergency generators use, according to Scott AFB personnel.

The USTs are constructed of double-walled fiberglass reinforced plastic (FRP) and the piping is flex piping. Therefore, cathodic protection is not required for the tanks or piping.

The tanks have a spill bucket for spill protection and an audible alarm for overfill prevention.

Although these are emergency generator USTs and are deferred from the federal release detection requirement, the tanks are implementing a Veederoot TLS 350 Automatic Tank Gauging (ATG) method to meet release detection requirements. The facility provided me a year's worth of records for the tank. All the monitoring records for the tanks at this location appeared acceptable. The piping is classified a "safe suction".

Building 450

Three Jet Fuel USTs are located by building number 450. UST #99 is 2.5K gallons, UST #100 is 1K gallons and UST # 101 is 600 gallons.

The USTs are constructed of double-walled FRP and the piping is also double-walled FRP. Therefore, cathodic protection is not required for the tanks or piping.

The tanks have a spill bucket for spill protection and an visual alarm for its overfill prevention (see photo #1). However, the system did not have a "test" button to verify that the system was operating properly. Mr. Bergmann or Ms. Daggit had a tanker truck to fill one of the tanks to verify that the overfill alarm was operating properly. Although the alarm was about 150 away from the tank, it could be easily viewed. However, I recommended that the system also have an exterior audible alarm installed as an added safety feature.

The tanks are implementing a Veederoot TLS 350 ATG method to meet their release detection requirements. The system was of the Continuous Statistical Leak Detection type. The facility provided me a year's worth of records for each tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping is classified a "pressurized" system. The piping systems are implementing interstitial monitoring (i.e., sump sensor) and automatic line leak detectors (ALLDs) as their method of release detection (for the piping). Some of the sump sensors appeared to be set too high off the bottom of the tank and needed to be re-set. Mr. Bergmann or Ms. Daggit provided me a year's worth of sump monitoring records for the piping of each tank. All of the monitoring records for the tanks at this location appeared acceptable. The piping ALLDs were of the "mechanical" Red Jacket FXIV type. The facility provided documentation to show that they had an annual function test on June 17, 2009. However, an examination of the ALLD devices revealed that the venting ports appeared to be plugged up with cement (see photo #2) and lacked certain components (i.e., venting tubes). Therefore, the system did not appear to be installed per manufacturer requirements and the alteration of this system could adversely affect the operability of the device.

Building 565

Four 10,000 gallon USTs are located by building number 565. UST #107 contains gasoline, UST #108 E-85, UST#109 B-20, and UST #110 contains diesel.

The USTs are constructed of double-walled FRP and the piping is also double-walled FRP. Therefore, cathodic protection is not required for the tanks or piping. The facility provided a December 7, 2007 signed statement of "Compatibility" for the E-85 tank; the statement was submitted to the Illinois Office of the State Fire Marshal.

The tanks are located in a spill containment area that directs fluids into an oil water separator (see photo #3). For overfill protection, the facility has audible alarms.

The tanks are implementing a Veederoot TLS 350 ATG method to meet release detection requirements. The system was of the Continuous Statistical Leak Detection type. The facility provided me a year's worth of records for each tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping is classified a "safe suction" for the USTs #109 & #110, while USTs #107 & #108 are pressurized. These latter tanks implemented electronic line leak detectors (ELLDs) as their method of release detection (for the piping). The facility provided documentation showing that the ELLDs had an annual function test on June 23, 2009. The ELLD are typically capable of performing an annual 0.1 gallon per hour test. A report of this test was provided me and was verified for the past year. The only issue of concern is that the piping underneath the "biodiesel" dispenser appears to show signs of "weeping" around the piping. I advised the facility to have their contractor to examine it in case a fitting may be loose.

Building 3200

One 6,000 gallon UST, containing diesel, is located by building number 3200. The UST is solely used for emergency generators, according to Scott AFB personnel.

The tank and piping are constructed of double-walled FRP. Therefore, cathodic protection is not required for the tanks or piping.

The tanks have a spill bucket for spill protection and an audible alarm for its overfill prevention. The alarm was tested and it appeared to function properly.

Although this tank is an emergency generator UST, and is deferred from the federal release detection requirement, it is implementing a Veederoot TLS 300 ATG method to meet release detection requirements. Mr. Bergmann or Ms. Daggit provided me a year's worth of records for the tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping (also deferred from the federal release detection requirement), is classified a "safe suction". The turbine sumps also had "sump sensors" for interstitial monitoring of the double-walled piping. However, the piping was covered with tape and mastic at the point it entered the sump area (see photo #4). Although this is not a federal violation since the piping is deferred from release detection, the covering of the piping opening prevents the sump sensors from adequately monitoring the piping or sump area.

An inspection of the sump beneath the dispenser revealed a considerable amount of water with some oil/petroleum residue. Part of the stainless steel flex piping was submerged in the water (see photo #5). Although the federal UST requirements do not address this corrosion protection issue (in water), I reminded the facility that the Illinois Office of the State Fire Marshal would view this as a violation. He recommended that the facility personnel address this issue by either properly remove the water or install corrosion protection. The facility personnel should also contact the State Fire Marshal for additional before conducting any work and to obtain additional information.

Building 1575

One 20,000 gallon UST, containing diesel, is located by building number 1575. The UST is solely used for emergency generators, according to Scott AFB personnel.

The tank and piping are constructed of double-walled FRP. Therefore, cathodic protection is not required for the tanks or piping.

The tank has a spill bucket for spill protection and an audible alarm for its overfill prevention. However, when the alarm was tested, it did not function at all. I recommended that that facility personnel contact their contractor to get the alarm system repaired.

Although this tank is for an emergency generator, and is deferred from the federal release detection requirement, the tank is implementing a Veederoot TLS 300 ATG method to meet its release detection requirements. The facility provided me a year's worth of records for the tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping (also deferred from the federal release detection requirement) is classified a "safe suction".

Building 1900 -

One 15,000 gallon UST, containing diesel, is located by building number 1900. The UST is solely used for emergency generators use, according to Scott AFB personnel.

The UST is constructed of double-walled FRP and the piping is flex piping. Therefore, cathodic protection is not required for the tank and piping.

The tank has a spill bucket for spill protection and a drop tube with a mechanical shut-off device for its overfill prevention.

Although this is an emergency generator UST and is deferred from the federal release detection requirement, the tanks are implementing a Veederoot TLS 300C Automatic Tank Gauging (ATG) method to meet release detection requirements. The system was set up for continuous statistical leak detection. The facility provided me a year's worth of records for the tank. All the monitoring records for the tanks at this location appeared acceptable. The piping is classified a "safe suction".

Opening the turbine sump pit covers revealed that the sump sensors, situated inside the turban sump, were set too high at about 6-8 inches from the base. In addition, water was in the sump and in contact with some of the piping fittings (see photo #6). Although the federal UST requirements do not address this corrosion protection issue (in water), I reminded the facility that the Illinois Office of the State Fire Marshal would view this as a violation. He recommended that the facility personnel address this issue by either properly remove the water or install corrosion protection. The facility personnel should also contact the State Fire Marshal for additional before conducting any work and to obtain additional information.

Building 1700

One 8,000 gallon UST, containing diesel fuel is located by building number 1700. The UST is solely used for emergency generators use, according to Scott AFB.

The UST is constructed of double-walled FRP and the piping is flex piping. Therefore, cathodic protection is not required for the tank and piping.

The tank has a spill bucket for spill protection and a drop tube with a mechanical shut-off device for its overfill prevention.

Although this tank is an emergency generator UST, and is deferred from the federal release detection requirement, the tank is implementing a Veederoot TLS 350 ATG method, with the system Continuous Statistical Leak Detection, to meet release detection requirements. The facility provided me a year's worth of records for the tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping (also deferred from the federal release detection requirement) is classified a "safe suction".

Building 1640

Four gasoline USTs are located by building number 1640. All USTs at this facility are 12,000 gallons in capacity.

The USTs are constructed of double-walled FRP and the piping is flex piping. Therefore, cathodic protection is not required for the tanks or piping.

All tanks have spill buckets for spill protection and a drop tubes with a mechanical shut-off devices for overfill prevention.

The tanks are implementing a Veederoot TLS 350 ATG method to meet release detection requirements. The system was of the Continuous Statistical Leak Detection type. The facility provided me a year's worth of records for each tank. All the monitoring records for the tanks at this location appeared acceptable.

The piping is classified as a "pressurized" system. The piping systems are implementing ELLDs as their method of release detection (for the piping). The facility provided documentation showing that the ELLDs had an annual function test on June 23, 2009. The ELLD are typically capable of performing an annual 0.1 gallon per hour test. However, a printout of the line leak history showed that no 0.10 gallon per hour test was conducted in the past year. I was informed that the system would be set up in two weeks to be able to conduct the 0.10 test. The facility also has interstitial sump sensors located in the tank turbine sump areas. However, no monthly records were maintained and sleeves were covering the opening of the piping thus preventing the sumps from operating properly (see photo #7 & #8).

EPA CONCERNS

- 1. Failure to provide adequate release detection monitoring for the piping of the USTs located at building #1640, as is required by 40 CFR $\S280.44$
- 2. Failure to use a overfill prevention system for the UST located at building #1575, as is required by 40 CFR §280.20(c).
- 3. Failure to provide adequate line leak detector system for the piping of the USTs located at building # 450, as is required by 40 CFR §280.44(a).
- 4. Recommend that the facility addresses the UST corrosion protection issues for steel piping in water for the USTs located at buildings #3200 and #1900
- 5. Recommend that the facility addresses the sump sensors height issues (i.e., set too high) for the USTs located at buildings #450 and #1900



Photo #1: Visual alarm for the USTs located at Building #450. The alarm is located about 150 feet away from the tanks. The photo was taken on 7/21/09 at 10:17 a.m. (not 7/20/09, due to incorrect camera settings).

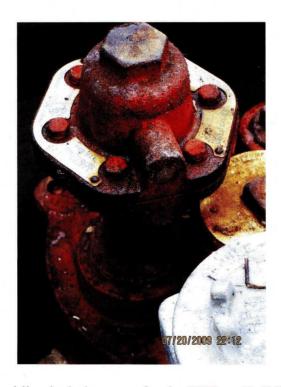


Photo #2: Mechanical line leak detectors for the USTs at Building #450. Note the "plugged" vent lines with cement. The photo was taken on 7/21/09 at 10:12 a.m. (not 7/20/09, due to incorrect camera settings).



Photo #3: USTs located at Building #565 showing Spill Prevention are located in "sloped" spill containment area. There is a drain grate at the lowest point that directs fluid into an oil/water separator. The photo was taken on 7/21/09 at 11:48 a.m. (not 7/20/09, due to incorrect camera settings).

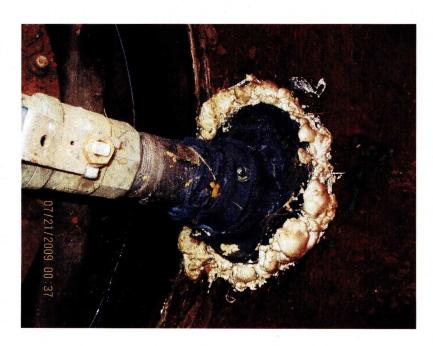


Photo #4: Emergency Generator UST located at Building #3200 showing pipe entering turbine sump area of tank. The piping interstice openings were sealed off with tape and mastic. (Note: The time of the photo is not accurate, due to incorrect camera settings. The photo was taken on 12/21/09 at 12:37 p.m.).

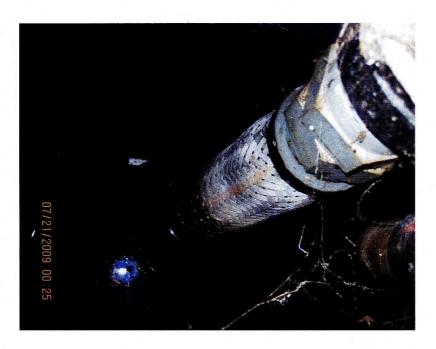


Photo #5: Emergency Generator UST located at Building #3200 showing dispenser sump and stainless steel flex connector piping in contact with water/product. (Note: The time of the photo is not accurate, due to incorrect camera settings. The photo was taken on 12/21/09 at 12:25 p.m.).



Photo #6: Emergency Generator UST located at Building #1900 showing dispenser sump and piping fittings and connector in contact with water/product. (Note: The time of the photo is not accurate, due to incorrect camera settings. The photo was taken on 7/22/09 at 8:58 a.m.).



Photo #7 & #8: Turbine Sump for USTs located at Building #1640 at Scott Air Force Base. Photo shows boot covering the opening of pipe. The electronic line leak detector is also visible. (Note: The photos were taken on 7/22/09 at 9:45 a.m., and not 7/21/09, due to incorrect camera settings).



Spill Prevention Containment and Counter Measures (SPCC)

On July 22, 2009, I agreed to conduct a cursory review of the facility SPCC measures and a review of the facility documents. I was able to inspect the following facilities:

- BFSA above ground storage tank (AST) at building 560
- 126 ARW storage complex AST at building 5038, and
- 126 ARW Vehicle Fueling area ASTs at building 5029

At these sites, I examined containment dikes, high-level alarm systems, signs for corrosion, and collection traps. Overall he did not identify any significant deficiencies other than some corrosion along the piping at Building 5038.

The facility has a contract with TetraTech to inspect all of the AST on the base and conduct some maintenance work. I was informed that work would commence on November, 2009.

I next reviewed the "Integrated Contingency Plan for Oil Spill Prevention and Response." I was able to confirm that the following key components of the SPCC plan were accomplished:

- The PE Certification
- Description of the physical layout of the facility with location and contents.
- Counter measures for discharge
- Security issues
- Information that no large oil discharges (i.e., 1000 gallons) occurred within past 12 months or changes in facility design.
- The names of designated individuals accountable for discharge prevention, etc.

Lastly, I toured the base to observe "flow control gates" situated around the base (see photo).



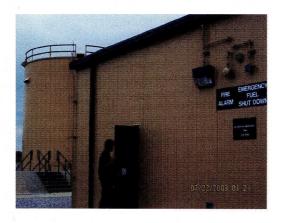


Photo #9 & #10: BFSA ASTs located at building 560 and showing the two 210,000 gallon ASTs containing JP-8 fuel. Note the minor corrosion around the flanges, of one tank.





Photos #11 & #12: BFSA ASTs at building 560, showing a spill Containment Dike for the two 210,000 gallon ASTs. The second photo shows the corner drain that empties into the Oil Water Separator.

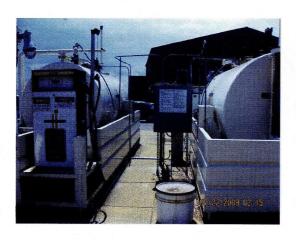


Photos #13: BFSA ASTs at building 560 showing the control building with SPCC overfill alarms and emergency shut down alarms





Photos #14 & #15: 126 ARW storage complex with two 206,000 gallon ASTs (not shown) containing JP-8 fuel at building 5038. The photos show the sloped spill containment area where vehicles are fueled. Any spilled product is caught and drained into an Oil Water Separator tank.





Photos #16 & #17: Showing the 126 ARW Vehicle Fueling area ASTs at building 5029. The photos show two 2,500 gallon diesel and gasoline ASTs in pre-engineered secondary containment.





Photos #18 & #19: Showing one of several "flow control gates" situated around the base. The gates can be closed to contain any contaminate.

Compliance Evaluation Inspection Report

Scott Air Force Base Belleville, IL

July 2009

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY Ariel Rios, 1200 Pennsylvania Ave., NW Washington DC, 20460



Submitted by:

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USEPA Contract No. EP09001182

Michael Prescott, Contractor Inspector

7/11/09 Date

COMPLIANCE EVALUATION INSPECTION REPORT

U.S. Environmental Protection Agency Ariel Ríos, 1200 Pennsylvania Ave., NW Washington DC, 20460

Facility Name:

Scott Air Force Base

Facility Address:

701 Hangar Rd., Belleville, IL 62225

NPDES ID Numbers: ILR002659, ILR400611, IL0026859, ILR10

RCRA ID Number:

IL7570024177

Dates of Inspection: July 21 - 23, 2009

Inspectors:

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Bill Smith, 375 CES/CEOI

Jim Route, Jr., 375 CES/CEO, Operations Flight Deputy

Dan Yaann, 375 CES/CEOIB, WWTP Operator

Dwight Brooks, 375 CES/LGRVM, Hazardous Waste Manager

Sgt. Jones, Engineering Tech

Sgt. Duncan, Alternate Facility Manager Carl Hodges, 375 CES/CEFO, Deputy Fire Chief Randy Gray, 375th Air Field Manager CMSgt. Hugh Short, 126th Branch Chief Tim Huchel, 126th OIC CMSgt. George Elder, 375th MMA, Maintenance Supervisor Jared Zipprich, Project Manager, K & S Associates Blake Uppleger, Quality Control Officer, Scott Alliance JV Supervisor Don Cissell, Project Engineer, Army Corps of Engineers Gerald Puetz, Project Engineer, Army Corps of Engineers Chris Panzau, Construction Rep., Army Corps of Engineers Jacob Freeman, Jr., Project Engineer, Army Corps of Engineers Hamze Fares, Project Engineer, Army Corps of Engineers Col. John Keoshian, AFPM Construction, Army Corps of Engineers David Mueller, Resident Engineer, Army Corps of Engineers Larry Wernle, Senior Project Engineer, Army Corps of Engineers

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ATTACHMENTS

ATTACHMENT A: PHOTOGRAPH LOG
ATTACHMENT B: NON-STORM WATER DISCHARGES EXCERPT FROM INDUSTRIAL
SWPPP AND LETTER FROM SAFB DESCRIBING CURRENT STATUS

1. INTRODUCTION

The Region 5 office of the United States Environmental Protection Agency (USEPA) requested that Scott Air Force Base (SAFB) in Belleville, IL be inspected under the Federal Facilities Inspection Initiative. Eastern Research Group (ERG) and its subcontractor, Michael Prescott, under USEPA's Federal Facilities Enforcement Office (FFEO) contract, provided assistance to USEPA in preparing for and conducting the inspection, as well as preparing the inspection report.

USEPA, IEPA, and contractor personnel conducted the inspection of the SAFB and its major tenants on July 21 through July 23, 2009. An inbrief was given to SAFB personnel on July 21 and the inspection was concluded with an outbrief for numerous representatives of SAFB on July 23. SAFB was given notice of the inspection on July 16, 2009. The inspection evaluated compliance with the Resource Conservation and Recovery Act (RCRA) and Clean Water Act (CWA) requirements.

The following general information on the facility was taken from the facility's website www.scott.af.mil:

The 375th Airlift Wing (AW) makes possible the command and control of the United States' entire military transportation effort. As the host unit, the 375th AW supports four major headquarters and a numbered air force with worldwide responsibilities: U.S. Transportation Command, Air Mobility Command, the Surface Deployment Distribution Command, Defense Information Technology Systems Agency and the 18th Air Force. It also provides support for the Air Force Communications Agency, the Defense Information Technology Contracting Office, the 932nd Airlift Wing (Reserve) and the Illinois Air National Guard's 126th Air Refueling.

Scott Air Force Base maintains an airport with an 8,000-foot runway, an Air Traffic Control Tower (built in 1997), and 22 home-based aircraft.

C-9A Nightingale (3 total)

- -- The C-9A is a modified version of Boeing DC-9, and is the only aircraft in the Air Force inventory specifically designed for movement of litter and ambulatory patients.
- -- Flown and maintained by the 932nd Airlift Wing and can carry 40 litter patients or 40 ambulatory and four litter patients, or combinations of those

C-21A (12 total)

- -- The C-21A is the military version of the Learjet 35A business jet
- -- Wing owns all US-based C-21s, 50 aircraft, operating out of 6 locations throughout the US

KC-135E (11 total) - The KC-135E is a modified Boeing 707

-- The mission is to provide air refueling to virtually all Air Force, Navy and Marine Corp aircraft

-- Flown and maintained by the 126th Air National Guard (ANG)

Scott AFB has about 1,400 family housing units. Besides family housing, there are 963 buildings, comprising more than 7 million square feet of space. Of those buildings, 37 are on the National Registry of Historic Places. Scott AFB is 2,560 acres. The base also has easement/right of way to another 1,029 acres. Scott has roughly 5,800 active duty military and 2,000 Air National Guard and Air Force Reserve members, as well as approximately 8,314 family members assigned. The base also employs more than 3,100 Federal civilian employees and more than 2,400 non-appropriated fund contract civilians and private business employees. There are an estimated 17,000 retired military members in the local area.

SAFB has several tenants including the 126th ANG and 932nd Air Reserve. According to facility representatives, the 375th AW acts as the host for all of the tenants and generally manages environmental programs for the Base including CWA programs and the RCRA hazardous waste management program under one Generator ID Number. Mr. Patterson was the primary environmental contact for SAFB; he and his staff provided assistance to the inspectors and escorted them around the Base.

This report presents observations and potential concerns from the contractor inspection of the SAFB facility. The other USEPA inspectors prepared separate reports. Section 2 of this report outlines the Clean Water Act permits and regulations that were evaluated during the inspection by the contractor inspector and provide key information and compliance related observations on the facility. Section 3 lists the concerns noted during the inspection. Following these sections are attachments consisting of a photograph log (Attachment A) and other documents related to the SAFB CEI. Please note the photographs in the photograph log are numbered according to the chronological order they were taken.

2. CLEAN WATER ACT

2.1 CURRENT APPLICABILITY AND PERMIT STATUS

This section discusses the evaluation of compliance with the National Pollutant Discharge Elimination System (NPDES) Permits and Storm Water regulatory requirements promulgated under authority of the CWA. SAFB has a NPDES Permit for direct discharges to an unnamed tributary of Silver Creek from a Wastewater Treatment Plant (WWTP) and other sources (hereinafter referred to as the WWTP Permit). SAFB is also covered under the Illinois General NPDES Permit for Discharges from Small Municipal Separate Storm Sewer Systems (hereinafter referred to as the MS4 Permit). SAFB also filed a Notice of Intent (NOI) to be covered under the Illinois General NPDES Permit for Storm Water Discharges from Industrial Activities (hereinafter referred to as the Industrial Storm Water Permit). In addition, Ms. Frangos reported there were four construction projects ongoing at the SAFB for which NOIs had been submitted for coverage under the Illinois General NPDES Permit for Storm Water Discharges from

Construction Activities (hereinafter referred to as the Construction Storm Water Permit).

2.2 PREVIOUS COMPLIANCE INSPECTIONS AND ENFORCEMENT ACTIONS

According to the USEPA Online Tracking Information System (OTIS) database and Mr. Caughman, the last inspection for the NPDES Permit for the WWTP was on 4/15/08; the last inspection for the MS4 Permit was on 5/6/08; and there were no past inspections for the Industrial Storm Water Permit. The facility was noted in the OTIS database as being in noncompliance with the WWTP Permit for 8 of the last 9 quarters, but no enforcement actions were noted in OTIS for the past 5 years for any CWA permits. Mr. Caughman reported he and Gerry Golubski of USEPA Region 5 conducted an inspection for compliance with the Construction Storm Water Permit on 5/7/09 and no enforcement actions were taken in response to this inspection.

2.3 DOCUMENTS REVIEWED AND RELATED OBSERVATIONS

I reviewed the following documents related to the CWA regulatory requirements for the SAFB facility:

- 1. WWTP Permit (Permit No. IL0026859) effective 8/1/05 and expires 7/31/10.
- 2. Summary of Discharge Monitoring Reports (DMRs) for the last six years.
- 3. MS4 Permit (Permit No. ILR400611) effective 4/1/09 and expires 3/31/14.
- 4. Final Scott AFB 2008 Phase II Annual Report for the MS4 Permit dated June 2009.
- 5. NOI for the MS4 Permit Renewal dated 2/29/08.
- 6. Industrial Storm Water Permit (Permit No. ILR00) effective 5/1/09 and expires 4/30/14.
- 7. Industrial Storm Water Pollution Prevention Plan (SWPPP) dated June 2004.
- 8. Annual Facility Inspection Report for the Industrial Storm Water Permit for June 2008 to June 2009 and undated.
- 9. Construction Storm Water Permit (Permit No. ILR10) effective 8/11/08 and expires 7/13/13.
- 10. NOIs for four active construction projects.
- 11. Construction SWPPPs for the Squadron Operations and Childcare Development Center construction projects.
- 12. IEPA inspection reports and related correspondence.

My review of the documents above generated the following observations related to CWA compliance.

SAFB operates a WWTP using trickling filters for secondary treatment and sand filtration for tertiary treatment. The NPDES Permit provides a set of limits that apply for direct discharges from the WWTP effluent to a tributary of Silver Creek and to the Golf Course Pond (Mr. Yaann reported this was done only in the summer months) and Scott AFB Lake II (not done in over 10 years). The Permit also contains less stringent standards for "Excess Flow" discharges during

high precipitation events that exceed the "Maximum Practical Flow" (MPF) of the WWTP and do not receive secondary and tertiary treatment. According to Mr. Yaann, the MPF (which he estimated was about 2.2 MGD), could be significantly increased to closer to the Maximum Design Flow of 3.0 MGD with relatively minor plumbing changes to the influent to the trickling filters. This would reduce excess flows to the receiving stream that do not receive secondary treatment and thus reduce pollutant loadings and the chance of violations of effluent limits and water quality standards.

According to Mr. Smith, the WWTP has not had any exceedances of effluent limits in the last five years except for exceedances of the Zinc limit added to the modified Permit on 3/29/07. The facility has exceeded this new Zinc limit 20 or the last 23 months. The effective date of the new Zinc limit specified in the Permit was 24 months from the effective date of the Permit which would be 8/1/07. However, Mr. Smith and Mr. Port believe the effective date of the Zinc limits should have been 24 months after the Permit modification date which would be 3/29/09. The new Zinc limit is .044 mg/l which the Base is having difficulty meeting, according to Mr. Smith, because a chemical with Zinc is added to the drinking water by the water supplier.

SAFB has been permitted under the Phase II MS4 Permit program for about six years. The Storm Water Management Program developed by the Base is in a tabular format and is currently under review by USEPA Region 5 for adequacy in complying with the MS4 Permit. The Annual Reports required by the MS4 Permit have been submitted late to the IEPA: the 2007 report was submitted three months late and the 2008 report is almost two months late since it was due on June 1 and had not been submitted at the time of the inspection.

Under the MS4 Permit, SAFB is required to reduce pollutants in any storm water runoff from construction activities that disturb greater than one acre, including activities that disturb less than one acre, but are part of a larger common plan of development that would disturb more than one acre. I observed a disturbed area of less than one acre near the WWTP where a warehouse had been demolished and an adjacent warehouse was going to be demolished (see Photo 16). According to Mr. Patterson, there were several warehouses and buildings that were being demolished one at a time as funding became available, but were part of a planned project to remove these buildings. These demolition projects had not been subject to the MS4 Permit storm water control measures or the Illinois Construction Storm Water Permit.

SAFB also has storm water discharges covered under the Industrial Storm Water Permit. SAFB submitted NOIs to be covered under the old and new Permits. SAFB prepared an Industrial SWPPP that was dated June 2004 and was out of date and inadequate. Ms. Frangos reported a newer SWPPP had been drafted by a contractor a year ago, but due to contracting issues, it was never finalized and implemented. The existing SWPPP had the following deficiencies:

• The Plan was out of date and consequently did not address numerous changes at the Base in the last five years and did not address changes to the requirements in the new Permit.

- The Plan specified the persons and activities of the Storm Water Pollution Prevention Team, but the personnel have changed and the Team has not been active.
- The site maps in the Plan do not adequately meet all of the Permit requirements.
- The Plan identified non-storm water discharges and cross-connections at the Base (see Attachment B), but SAFB representatives reported many of these had not been corrected. I requested SAFB prepare a letter to me and IEPA describing the current status and identifying which non-storm water discharges had not yet been corrected. The letter reported that approximately one third of the correction work was completed in 2006 and the remaining work is programmed for Fiscal Year 2012 (see attachment B for a copy of the letter).
- There were no site-specific details on hazardous materials exposed to storm water at the various industrial areas and appropriate Best Management Practices (BMPs) for these areas.
- The Plan specified that all personnel at Scott AFB will receive an initial overview of the SWPPP and during annual refresher training, but the last training given was a year ago and only 20 people of the over 13,000 people employed at the Base received training.
- Quarterly inspections required by the Permit have only been conducted sporadically and not adequately documented (per Ms. Frangos).

In addition, the 2008 Period Annual Facility Inspection Report required by the Industrial Storm Water Permit indicated a major problem was lack of functioning spill gates and said funding was awarded to correct it. Mr. Patterson reported a design contract would be awarded soon and hopefully construction would follow in 2010. The Report also identified significant erosion and sediment issues in Ash Creek which flows to Silver Creek. Silver Creek is an impaired water body for sedimentation/siltation listed by the state. I inspected two of the areas identified in the report, Storm Water Pump Station #1 and the Bridge over Ash Creek near the Surface Deployment and Distribution Center (SDDC), which are described in the next subsection.

Ms. Frangos reported there were four active construction projects on the Base for which NOIs had been submitted for coverage under the Illinois Construction Storm Water Permit. I very briefly reviewed the SWPPPs for two of the projects, the Squadron Operations and Childcare Development Center projects, and inspected these two construction sites which are discussed below.

2.4 FACILITIES INSPECTED AND RELATED OBSERVATIONS

I inspected numerous indoor and outdoor areas of the Base to evaluate compliance with all of the CWA Permits requirements. The areas I visited are listed below in bold headings and relevant observations that were noted are presented under each heading. All photographs referred to in these subsections are contained in Attachment A and the photographs are numbered in the chronological order in which they were taken. Note Mr. Lewis reported most storm water outfalls discharge directly or indirectly to Silver Creek.

Wastewater Treatment Plant

I visited the SAFB WWTP with the IEPA inspector, Mr. Port, who regularly inspects the plant. No concerns were identified specific to the operation of the plant other than those identified above regarding the Zinc exceedances and excess flow discharges (a picture of the excess flow initial treatment tank is shown in Photo 15). However, behind the WWTP, I observed an area where hazardous materials and wastes were stored (see Photos 17 - 19). The concerns and observations for this area related to hazardous waste compliance are covered in Mr. Chachakis' inspection report. With regard to CWA, these hazardous materials were potentially sources of storm water contamination and BMPs should be developed for this area.

Ash Creek

I inspected various parts of Ash Creek to identify any concerns with pollutants entering the Creek or for signs of degradation. Ash Creek flows to Silver Creek which is a listed impaired water body of Illinois for sedimentation/siltation. Adjacent to Storm Water Pump Station #1, I observed severe erosion of the bank of Ash Creek (see Photo 12) that was caused by pumping of storm water from large pipes on the opposite bank of the Creek (see Photo 13). In addition, I observed large piles of accumulated sediment in the Creek, in particular next to a bridge near the SDDC (see Photo 14). Mr. Lewis reported this sediment had accumulated during and after the construction of the SDDC building. The MS4 Permit and the SWPPP required by the Industrial Storm Water Permit require control of storm water from the Base to prevent erosion and discharge of sediment.

Vehicle Maintenance

I observed vehicle maintenance was conducted in this building and Mr. Brooks reported that vehicles were washed inside and outside of the building (see Photo 20) in designated areas where the wastewater would drain to an oil/water separator and then the sanitary sewer to the WWTP. Mr. Brooks reported they do not wash vehicles anywhere else outside of the building.

Base Fire Department HQ

According to Mr. Hodges, the Fire Department washes vehicles inside the building in one of two bays and does not wash vehicles outside of the building. Mr. Hodges also reported very little maintenance was done on the vehicles at the Fire Department because it was performed at Vehicle Maintenance.

Civil Engineering (CE) and Residual CE Yards

In the main CE Yard, I observed a fully enclosed building for storing salt and an adjacent double wall tank for storing calcium chloride (see Photo 21). Also in the CE Yard was the Pest Management/Entomology Shop which had covered bermed areas in front of the two buildings for chemical mixing and storing application equipment (see Photo 22). I did not observe salt exposed to storm water at SAFB in the CE Yard or anywhere else on the Base. I observed the Residual CE Yard was used to store materials and equipment for reuse and also included a washrack for cleaning dirt from vehicles and equipment (see Photo 23). Under normal circumstances, this washrack should not discharge to the storm sewer. But during heavy use and rain events, it could discharge to the overflow storm outlet connected to the storm sewer. Consequently, BMPs should be developed for this washrack to prevent detergents and oil and grease from contaminating storm water.

Aircraft Washing and Deicing Areas

The inspectors met with personnel from the 375th Operation Support Squadron, 126th ANG, and 932nd Air Reserve responsible for flight operations to discuss aircraft washing and deicing. According to these representatives, all aircraft washing was conducted inside buildings where wastewater would discharge to the sanitary sewer. In addition, these personnel reported deicing of aircraft was conducted either at the deicing pad operated by a contractor on the commercial side of the airport or at the 126th deicing pad (see Photo 24). I observed this deicing pad to be sloped towards drains to contain the deicing wastewater. Mr. Short reported there was a valve on the drain line which directed wastewater during deicing to an underground tank and directed storm water to a storm sewer when they were not deicing. Mr. Short explained that the tank was pumped out by a contractor and shipped off-site for recycling/treatment. According to Mr. Short, they have significantly reduced deicing fluid usage by staging aircraft in hangars prior to flights and with hot air application equipment.

Squadron Operations and Childcare Development Center Construction Projects

These were two separate projects with two different contractors. I visited the first site with the IEPA inspector, Mr. Caughman, was the Squadron Operations project that disturbed about 3.75 acres and K & S Associates was the prime contractor. Numerous concerns were identified at the construction site including the following:

- Mr. Zipprich reported land at the site was first disturbed in December 2008, but the inspections required every 7 days and after certain storm events were not conducted until 4/30/09.
- The person that conducts the inspections, Mr. Zipprich, did not appear to meet the
 qualifications for a qualified inspector that are specified in the Construction Storm Water
 Permit.
- The Storm Water Permit was not posted and Mr. Zipprich was not familiar with the Permit requirements.

- There were no signed certification statements in the SWPPP from the contractor and any subcontractors involved in storm water control measures.
- Additional gravel was needed at the construction entrance because silt had filled in areas of the gravel (see Photo 2).
- Silt fences appeared to be used in the appropriate areas (see Photo 1), but some of the fences were bent over from accumulated silt (see Photo 8).
- The drain inlet next to the cement block cutter showed evidence of cement dust getting into the storm drain (see Photo 5) and needed a fabric cover like the other inlets or other method of preventing silt and dust from getting into the drain.
- Mr. Caughman recommended the cement wash and grout areas (see Photos 3 and 4) be marked and made into one combined area.
- Some of the drains at ground level (see Photo 6) should be refitted with fabric and improved with gravel, silt socks, or other method of surrounding the inlets to prevent silt from accumulating at the edges of the drains, such as the inlet shown in Photo 7.

The second site I visited was the Childcare Development Center project that disturbed about five acres and Scott Alliance JV was the prime contractor. For the most part, this site had good erosion and sediment controls, including using Dandy bags to cover inlets (see Photo 9). The concerns that were identified at this site were the following:

- There was a signed certification statement in the SWPPP for the prime contractor, but not for the subcontractor that installed some of the sediment and erosion controls.
- The construction plans for the site had specified that a silt fence be installed above the drainage ditch on one side of the site (see Photo 11), but this had not been done and evidence of sediment from the graded area was observed in the ditch by the inspectors.
- Mr. Uppleger reported there were rocks to reduce flow of silt on the other side of the outlet of the retention pond, but not on the pond side of the outlet (see Photo 10). Mr. Caughman recommended rocks be added to correct this concern.

Both of these construction projects were managed by the Army Corps of Engineers (ACE). The inspectors held a meeting on 7/23/09 with eight ACE personnel assigned to SAFB, as well as SAFG environmental staff to discuss the concerns identified at the construction sites and corrective actions. This was an excellent meeting which covered implementing procedures to improve compliance at current and future construction sites. Two of the ACE managing personnel, Colonel Keoshian and David Mueller, appeared to be very interested in addressing these concerns, improving compliance, and getting their people trained. Col. Keoshian also wanted to implement our recommendation for third party contractors to conduct the required regular inspections of construction sites.

3. LIST OF CONCERNS

| REGULATORY OR PERMIT REFERENCE | POTENTIAL CONCERN | | | | | |
|--|---|--|--|--|--|--|
| WWTP Permit | SAFB has continuing exceedances of effluent permit limits for Zinc in discharges from the WWTP. | | | | | |
| MS4 Permit | The SAFB MS4 Storm Water Management Program is not adequate and current (awaiting completion of USEPA Region 5 review to determine if this is a concern). | | | | | |
| MS4 Permit | The 2007 Annual Report required by the MS4 Permit was submitted three months late and the 2008 report due by June 1, 2009 had not been submitted at the time of the inspection. | | | | | |
| MS4 Permit and Industrial Storm Water Permit | Severe erosion and accumulation of sediment were observed in Ash Creek which flows to Silver Creek. Silver Creek is a listed impaired water body of Illinois for sedimentation/siltation. | | | | | |
| MS4 Permit and Construction Storm Water Permit | The demolition of warehouses and buildings that were being demolished one at a time as funding became available, but were part of a planned project had not been subject to the MS4 Permit storm water control measures or the Illinois Construction Storm Water Permit. | | | | | |
| Industrial Storm Water Permit | The Industrial SWPPP (dated June 2004) identified numerous non-storm water discharges and cross-connections, of which only about one third had been corrected. | | | | | |
| Industrial Storm Water Permit | The existing Industrial SWPPP had the following deficiencies: The SWPPP was out of date and consequently did not address numerous changes at the Base in the last five years and did not address changes in the new Permit. The SWPPP specified the persons and activities of the Storm Water Pollution Prevention Team, but the personnel have changed and the Team has not been active. The site maps in the SWPPP do not adequately meet all of the Permit requirements. There were no site-specific details on hazardous materials exposed to storm water at the various industrial areas and appropriate Best Management Practices (BMPs) for these areas. Some examples where BMPs were needed included the area behind the WWTP and the CE Residual Yard. The SWPPP specified that all personnel at Scott AFB will receive an initial overview of the SWPPP and during annual refresher training, but the last training given was a year ago and only 20 people of the over 13,000 people employed at the Base received training. | | | | | |

| REGULATORY OR PERMIT REFERENCE | POTENTIAL CONCERN | | | | |
|-----------------------------------|--|--|--|--|--|
| | Quarterly inspections required by the Permit have only been conducted sporadically and not adequately documented. | | | | |
| Construction Storm Water Permit | At the Squadron Operations construction site, numerous concerns were identified including the following: Mr. Zipprich reported land at the site was first disturbed in December 2008, but the inspections required every 7 days and after certain storm events were not conducted until 4/30/09. The person that conducts the inspections, Mr. Zipprich, did not appear to meet the qualifications for a qualified inspector that are specified in the Construction Storm Water Permit. The Storm Water Permit was not posted and Mr. Zipprich was not familiar with the Permit requirements. There were no signed certification statements in the SWPPP from the contractor and any subcontractors involved in storm water control measures. Additional gravel was needed at the construction entrance because silt had filled in areas of the gravel. Some of the silt fences were bent over from accumulated silt and needed maintenance. The drain inlet next to the cement block cutter showed evidence of cement dust getting into the storm drain and needed a fabric cover like the other inlets or other method of preventing silt and dust from getting into the drain. | | | | |
| Construction Storm Water Permit | At the Childcare Development Center construction site, the concerns that were identified were the following: There was a signed certification statement in the SWPPP for the prime contractor, but not for the subcontractor that installed some of the sediment and erosion controls. The construction plans for the site had specified that a silt fence be installed above the drainage ditch on one side of the site, but this had not been done and evidence of sediment from the graded area was observed in the ditch. | | | | |

ATTACHMENT A: PHOTOGRAPH LOG

DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 1

COMMENTS: Silt fence inside site.

SITE LOCATION: Squadron Operations Construction Site



DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 2

COMMENTS: View of construction entrance with gravel that has been

filled in at some areas.

SITE LOCATION: Squadron Operations Construction Site



E TAKEN: 7/21/09 EN BY: Michael Prescott

PHOTO #: 3

COMMENTS: Unmarked waste grout accumulation area near construction entrance.

SITE LOCATION: Squadron Operations Construction Site



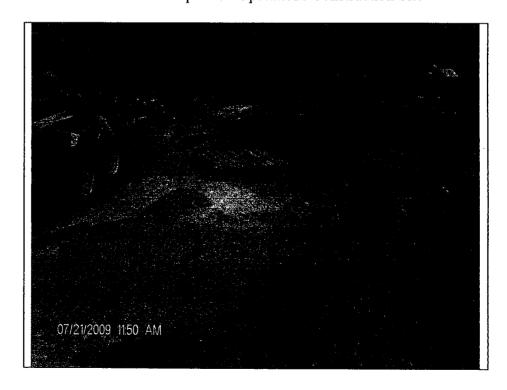
DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 4

COMMENTS: Unmarked cement wash area and drain inlet next to cement cutter (top right of photo).

SITE LOCATION: Squadron Operations Construction Site



DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 5

COMMENTS: Storm drain inlet with surrounding protection, but no fabric below the grate. There was a thick layer of cement dust over the drain inlet from the adjacent cement block cutter.

SITE LOCATION: Squadron Operations Construction Site



DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 6

COMMENTS: Storm drain inlet at ground level with only a cover below the grate that may not adequately keep out sediment.

SITE LOCATION: Squadron Operations Construction Site

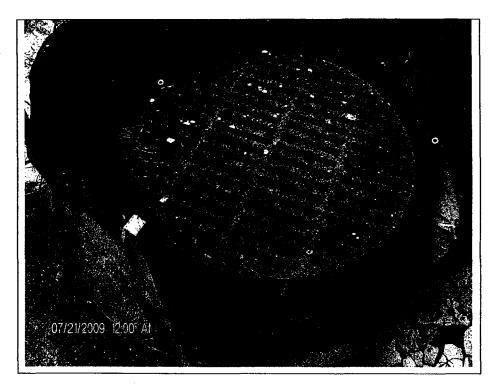


E TAKEN: 7/21/09 EN BY: Michael Prescott

PHOTO #: 7

COMMENTS: Storm drain inlet properly protected with fabric around the drain and below the grate.

SITE LOCATION: Squadron Operations Construction Site



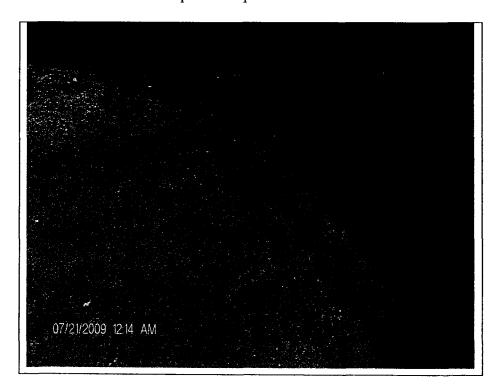
DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 8

COMMENTS: Silt fence with accumulated silt bending the fence.

SITE LOCATION: Squadron Operations Construction Site



DATE TAKEN: 7/21/09 **TAKEN BY:** Michael Prescott

PHOTO #: 9

COMMENTS: Dandy bag covering

storm inlet.

SITE LOCATION: Childcare Development Center Construction

Site



DATE TAKEN: 7/21/09 **TAKEN BY:** Michael Prescott

PHOTO #: 10

COMMENTS: Retention pond with accumulated silt and the outlet to the pond without any rocks on this side of the outlet.

SITE LOCATION: Childcare Development Center Construction

Site



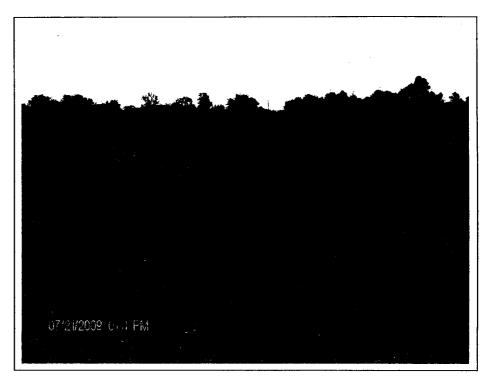
E TAKEN: 7/21/09 EN BY: Michael Prescott

PHOTO #: 11

COMMENTS: View of cleared hill above drainage ditch where there was supposed to be a silt fence, according to the construction plans.

SITE LOCATION: Childcare Development Center Construction

Site



DATE TAKEN: 7/21/09

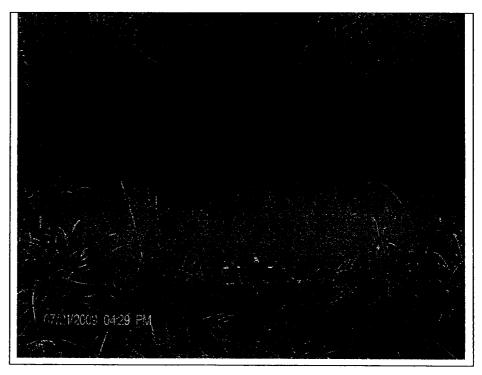
TAKEN BY: Michael Prescott

PHOTO #: 12

COMMENTS: Severe erosion of the

bank of Ash Creek.

SITE LOCATION: Storm Water Pumping Station #1



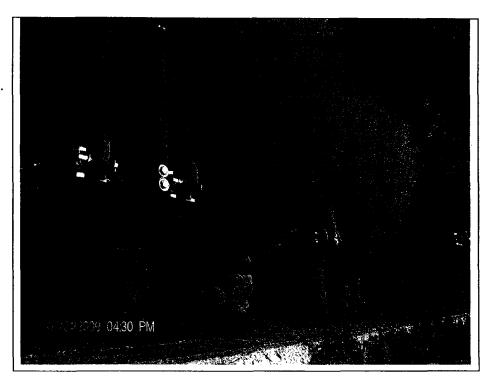
DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 13

COMMENTS: The sources of the erosion of Ash Creek in the photo above were storm water outlets from the pump station on the opposite bank.

SITE LOCATION: Storm Water Pumping Station #1



DATE TAKEN: 7/21/09

TAKEN BY: Michael Prescott

PHOTO #: 14

COMMENTS: Accumulated sediment in Ash Creek near the Surface Deployment Distribution Center.

SITE LOCATION: Bridge Over Ash Creek



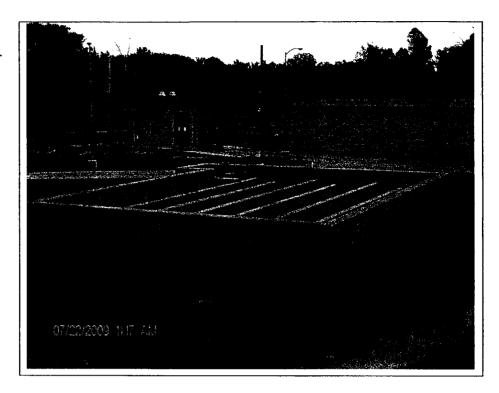
E TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 15

COMMENTS: Excess flow tank used to contain and treat excess flow.

SITE LOCATION: Wastewater Treatment Plant



DATE TAKEN: 7/22/09

TAKEN BY: Michael Prescott

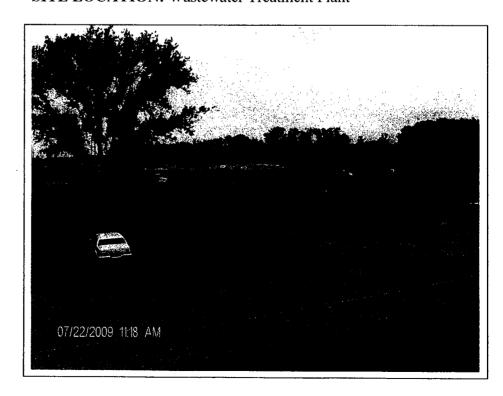
PHOTO #: 16

COMMENTS: View of disturbed

area where a warehouse was

demolished.

SITE LOCATION: Wastewater Treatment Plant



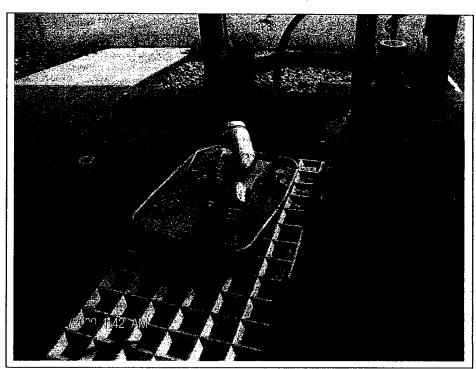
DATE TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 17

COMMENTS: Tray of wastes mixed with water in a spill pallet that was also full of liquid. These wastes were under cover in secondary containment.

SITE LOCATION: Behind Wastewater Treatment Plant



DATE TAKEN: 7/22/09

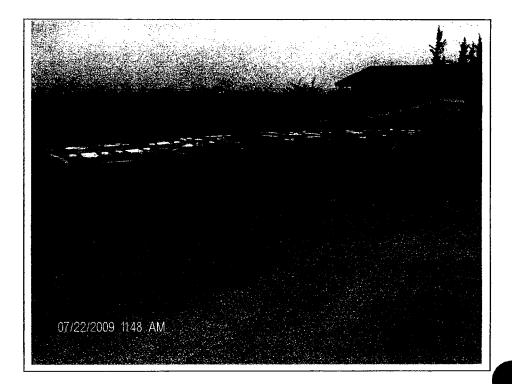
TAKEN BY: Michael Prescott

PHOTO #: 18

COMMENTS: 22 drums of propylene glycol stored outside and

exposed to storm water.

SITE LOCATION: Behind Wastewater Treatment Plant



E TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 19

COMMENTS: Drum and containers stored outside and exposed to storm

water.

SITE LOCATION: Behind Wastewater Treatment Plant



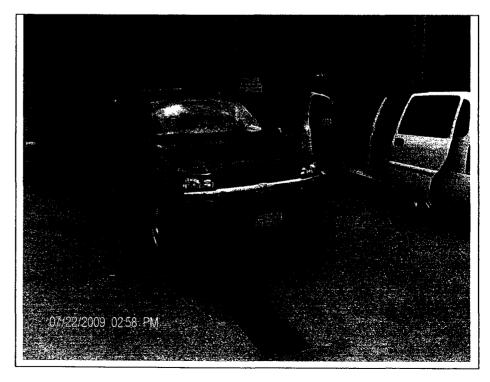
DATE TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 20

COMMENTS: View of washrack inside and outside building with trench drains that were reported to be connected to an oil/water separator and the sanitary sewer.

SITE LOCATION: Vehicle Maintenance Building



DATE TAKEN: 7/22/09 **TAKEN BY:** Michael Prescott

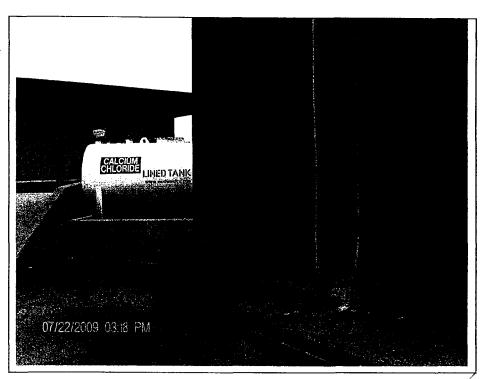
PHOTO #: 21

COMMENTS: Tank of calcium chloride in secondary containment and

salt storage in a totally enclosed

building.

SITE LOCATION: Civil Engineering Yard



DATE TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 22

COMMENTS: Containment area in

front of Pest

Management/Entomology buildings.

SITE LOCATION: Civil Engineering Yard



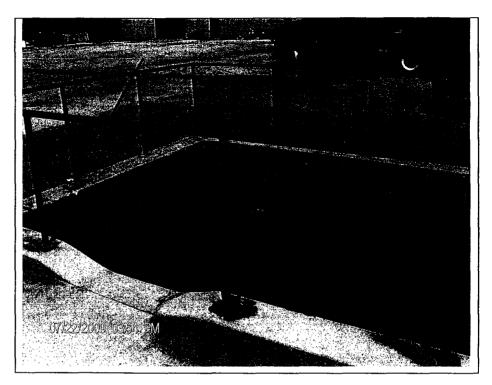
E TAKEN: 7/22/09

TAKEN BY: Michael Prescott

PHOTO #: 23

COMMENTS: Washrack for dirty equipment and vehicles. The only reported drain outlet is the one that is visible in the middle of the photo for overflow and it is connected to the storm sewer.

SITE LOCATION: Residual CE Yard



DATE TAKEN: 7/23/09

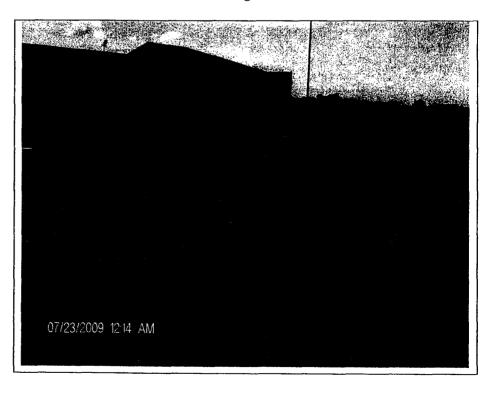
TAKEN BY: Michael Prescott

PHOTO #: 24

COMMENTS: Deicing application

and drainage pad.

SITE LOCATION: 126th AW Flightline



ATTACHMENT B: NON-STORM WATER DISCHARGES EXCERPT FROM INDUSTRIAL SWPPP AND LETTER FROM SAFB DESCRIBING CURRENT STATUS

| Non-Storm Water Discharges |
|--|
| ☐ No non-storm water discharges were identified during the past year. |
| X The following non-storm water discharge(s) were identified: |
| Describe the date and location; refer to Section 4.5 for more detail. |
| A discharge from the hospital building to the storm water system was documented during dye testing. The discharge may be from foundation seepage, but this could not be determined as a part of this update. |
| Several cross connections between storm water and sanitary sewer were discovered during an inflow and infiltration study being performed by another contractor. |
| |
| |
| |
| Deicing/Anti-Icing Operations |
| X Deicing/Anti-icing operations were performed on aircraft surfaces and paved airfield areas or adjacent Base roads/parking as follows: |
| Aircraft deicing operations are typically performed at the deicing area at the IANG ramp, which is designed to capture the spent deicing fluid for off-base disposal by a commercial contractor. |
| |
| |
| |
| |



DEPARTMENT OF THE AIR FORCE HEADQUARTERS 375TH AIRLIFT WING (AMC)

31 July 2009

Mr. Paul M. Schmidt Deputy Base Civil Engineer 701 Hangar Road Scott AFB IL 62225-5035

Mr. Michael Prescott US EPA Region 5 Contractor 5221 Burke Drive Alexandria VA 22309

Reference: EPA Multimedia Inspection at Scott AFB 21-23 Jul 09

Dear Mr. Prescott,

With respect to your question concerning correction of cross connections between stormwater and sanitary sewers, as noted in the 2004 Stormwater Pollution Prevention Plan (SWPPP), Appendix I, this response is submitted. An AMC wide 2003 initiative identified the need to remedy industrial and/or sanitary sewer inflow and infiltration (I&I) at all bases. A "Sewer Inflow and Infiltration Analysis and Rehabilitation Plan" was completed for Scott AFB in February 2005. In 2006 approximately one third of the correction work was completed. The remaining work is programmed for Fiscal Year 2012 accomplishment.

If you have any questions, please contact Ms. Vanessa Frangos at (618) 256-2226.

Sincerely,

PAUL M. SCHMIDT

Deputy Base Civil Engineer

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